

IN THE UNITED STATES DISTRICT COURT
FOR NEW HAMPSHIRE

IN THE MATTER OF THE SEARCH OF THE
RESIDENCE LOCATED AT
23 COBURN STREET, SALEM, NH,
A BLACK, HONDA ACCORD [NH V61876],
AND THE PERSON OF KYLE MORRIS OF
SALEM, NH

Case No. 22-mj-22-AJ

Filed Under Seal

**AFFIDAVIT IN SUPPORT OF AN APPLICATION FOR A
SEARCH WARRANT**

I, Wesley Garland, being first duly sworn, hereby depose and state as follows:

INTRODUCTION

1. I am a Special Agent with the Federal Bureau of Investigation (“FBI”), and have been since May 2019. I am currently assigned to the Joint Terrorism Task Force (“JTTF”) of the FBI’s Boston Division/Bedford, New Hampshire (“NH”) office. Before I became a Special Agent, I was a Police Officer in Virginia for nine years. Over my career, I have investigated and assisted investigations of robberies, burglaries, larcenies, assaults, and murders. During my career, my investigations have included the use of various surveillance techniques and the execution of various search, seizure, and arrest warrants.

2. I am a federal law enforcement officer of the United States within the meaning of Federal Rule of Criminal Procedure 41(a)(2)(C), duly authorized to conduct investigations of and make arrests for violations of United States Code.

3. The probable cause set forth in this affidavit is based upon my personal knowledge and observations, experience and training, as well as through information derived from cooperating individuals, database queries, extensive review of open-source information, as well as physical and electronic surveillance, and other methods.

4. Since the affidavit is being submitted for the limited purpose of establishing that probable cause exists to support the issuance of a search warrant, I have not included details about every aspect of the investigation. While this affidavit contains all the material information I am aware of that is pertinent to the requested search warrants, it does not set forth all of my knowledge about this matter. Where the contents of documents and the actions, statements, and/or conversations of others are reported herein, they are reported in substance and in part, unless otherwise indicated.

5. Based on my training and experience and the facts as set forth in this affidavit, there is probable cause to believe that Kyle Morris (“Morris”) made a materially false, fictitious, or fraudulent statement or representation to federal agents in violation of Title 18 U.S.C. § 1001, that Morris knowingly possesses a fully automatic firearm or destructive device in violation of 18 U.S.C. § 922(o)(1), possesses firearms while being an unlawful user of a controlled substance, in violation of 18 U.S.C. § 922(g)(3), and that Morris made material false statements on multiple ATF 4473 Forms in the acquisition of firearms in violation of 18 U.S.C. § 922(a)(6). There is also probable cause to search 23 Coburn Street, Salem, New Hampshire (the “Residence”), a black Honda Accord, NH V61876 (the “Honda”), and the person of Kyle Morris for evidence of these crimes, as described in Attachment B.

6. I know Morris lives at the Residence because I reviewed the Salem, NH GIS page, which shows Morris as the owner of the Residence. In addition, he has been surveilled there by law enforcement during the investigation. And, as described in more detail below, Morris identified the Residence as his present address on a Standard Form 85P (SF85P), a questionnaire for public trust positions.

7. I know that Morris drives the Honda because he has been observed, via surveillance, driving the Honda almost on a daily basis since November 5, 2020, and as recently as February 2, 2022. Morris is also listed as the only registered owner of the Honda per the NH Department of Motor Vehicles.

PROBABLE CAUSE

Background Information

8. In July 2020, a confidential human source (“CHS”)¹, whose information has been corroborated and proven reliable, informed the FBI that Morris, of Salem, New Hampshire, was recently kicked out of a New England based militia group. The CHS further advised the militia kicked Morris out of the group due to his violent rhetoric, such as advocating for the group to “mag dump a crowd of black lives matter protesters, especially the darker ones.” I know from my training and experience that the term “mag dump” is a colloquialism used by militia groups, among others, to mean, in the context of firing weapons, that a shooter fires as quickly as possible to expend all the rounds in a detachable magazine attached to a firearm, that is to “dump” all the bullets from the “mag”azine.

9. The CHS advised that Morris is a white supremacist extremist who had recently articulated, on an Encrypted Messaging Application (“EMA1”), a desire to commit acts of violence against people based on race and/or religion. The CHS reported that Morris made the following posts² under the username “Coil”:

¹ CHS has no criminal history, no pending or forthcoming charges, and has provided information voluntarily with no express guarantees.

² CHS provided the whole chat, including responses to Morris’ posts by other parties involved in the conversation. Those posts have been reviewed by the FBI, and were left out of this affidavit, as they were not relevant or material to this affidavit.



Coil

2:29:17 PM

We could have 20 men. 10 go on lome wolf attacks and to top it off at the enf of the day 10 of us raise hell in Lawrence shooting everything that moves and take a building

Raise our flag over it and fight until we die or capitulate

2:29:30 PM



Coil

2:30:04 PM

10 attacks across mass

Then one big one

2:30:07 PM

Start the race war ourselves

2:30:12 PM

Mosques, Synagogues, Diversity centers and businesses that hire non whites

2:31:03 PM

Politicians

2:31:06 PM

Then take a symbolic building

2:31:12 PM

And raise the new england flag and swastika over it

2:31:27 PM



Coil

2:32:04 PM

Then 9 other attacks



Coil

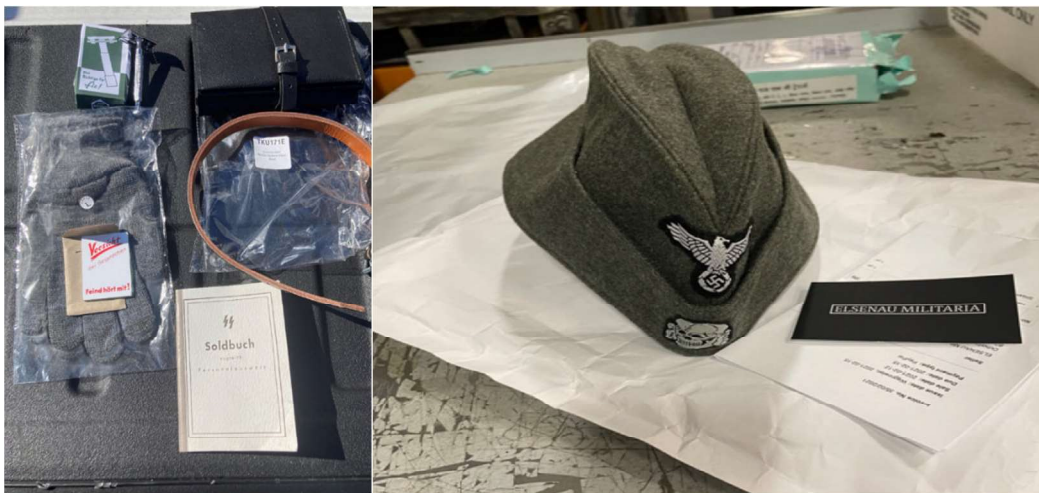
2:31:59 PM

We could have someone drive a truck into the state house and blow up

Investigation

10. On October 29, 2020, Morris called the FBI Bedford NH office and spoke with me. Morris explained that he believed, for various reasons, that he was “watchlisted,” and he wanted to know why. I advised Morris we could speak about it in person, but Morris declined.

11. Over the course of the investigation, Morris has purchased multiple firearms and received multiple packages from overseas. These packages, which were addressed to Morris at 23 Coburn Street, Salem, New Hampshire, were intercepted by Customs and Border Protection (“CBP”) personnel. Some of the items in these packages were various Nazi paraphernalia items as shown below:



12. On November 23, 2020 and November 24, 2020, a source “(S-1)” was interviewed two separate times by myself and Task Force Officer Kevin Leblanc (“TFO Leblanc”). It should be noted that S-1 previously had a close, intimate relationship and cohabitated with Morris, but their relationship ended poorly. S-1 advised they are afraid of

Morris, and that he was mentally abusive to them. S-1 is not a cooperating witness, but rather someone interviewed by the FBI due to their knowledge of Morris.

13. S-1 advised Morris is a racist, white nationalist, and “is definitely a Nazi.” S-1 advised that Morris describes himself as an “extremist and radical.” S-1 believes Morris will kill people and advised Morris has made comments about committing genocide on every race that is not white. S-1 advised Morris has a lot of Nazi/Hitler books and memorabilia.

14. S-1 advised Morris joined a militia group that was talking about taking over the government and killing pedophiles, but Morris left the group when they refused to “follow through” on the plan. S-1 advised that Morris camped out and trained with the militia group in the woods.

15. S-1 advised that Morris met the militia group on EMA1. S-1 advised Morris only uses encrypted applications so his conversations cannot be tracked.

16. S-1 advised that when Morris left the militia group, he found another group of guys he was talking to that were talking about violence and genocide against anyone who is not white.

17. S-1 advised that two of the men Morris met on EMA1 started a group with Morris that S-1 believed was called “New England Separatists.” S-1 advised they saw some of the conversations Morris and his friends had on EMA1 S-1 advised they would talk about things like killing pedophiles, Hillary Clinton, and other powerful politicians. S-1 advised they also talked about committing genocide against “blacks” and other minorities.

18. S-1 advised Morris previously built a fully automatic rifle. S-1 advised there was, at one point, a video on one of Morris’ smartphone applications, of Morris shooting the automatic rifle. S-1 observed on the video that the rifle Morris was firing was able to shoot

multiple times with a single pull of the trigger. S-1 advised that Morris later fixed the rifle to no longer be fully automatic, and then sold it to a friend.

19. S-1 advised Morris' usual screennames for his encrypted application accounts were "Kyleisbuck," "Kyleisbuck1999", and "CaptainMorris911." S-1 advised Morris used EMA1 mainly on his laptop, but also on his cellphone.

20. S-1 advised a family member of Morris', S-2, once told S-1 that Morris is one "spiritual awakening" from killing everybody.

21. S-1 advised Morris has threatened to kill himself in the past. S-1 advised Morris was recently in a car accident, and they believe it was a suicide attempt by Morris.

22. S-1 advised that Morris was recently fired from his job at Comcast because he was not doing his job.

23. On November 30, 2020, S-2 was interviewed by myself and TFO Leblanc. S-2 is a relative of Morris who has known him his whole life. It should be noted that S-2, like S-1, is not a cooperating witness, but rather someone who was interviewed based on their knowledge of Morris. S-2 advised there has been tension in their relationship with Morris over the years.

24. S-2 advised they have known and been concerned about Morris for decades. S-2 advised Morris has always had extremist views. S-2 advised they "house-sat" a few years ago for Morris' mother, Nancy Morris ("Nancy"). S-2 advised they recalled there were swastikas all over Morris' bedroom.

25. S-2 advised Morris is "on the line" of being someone who believes in being "prepared" to fight the government versus someone who would commit an overt attack. S-2 advised they have heard Morris talk about taking over the world, and Morris would read and

watch a lot of books and documentaries about Adolf Hitler. S-2 advised Morris would post videos to YouTube of himself doing the Nazi march and salute.

26. S-2 advised what concerns them about Morris is his love for guns combined with his ideology. S-2 advised that Morris reminds them of what they saw and heard about the Columbine High School shooters.

27. S-2 advised that another family member, who was known to hang around street gang members and drug dealers, once told S-2 that Morris “scared” them more than any drug dealer or gang member they had ever been around.

28. S-2 advised they and other family members said Morris would either come out of the military (Morris served in the United States Army) very patriotic or become a mass shooter. S-2 advised Morris is constantly “holed up” in his room playing “shoot-em up” video games. S-2 advised that Morris always seems uncomfortable and stressed, especially in social settings. S-2 advised they believe, like S-1, that Morris’ car crash was a suicide attempt by Morris.

29. S-2 recalled years ago, when Nancy owned the 23 Coburn Street residence, that she rented a room to a Jewish woman. S-2 advised Morris proceeded to draw swastikas on random items around the house. S-2 advised this woman also purchased a new car, and Morris drew a swastika on the side mirror so it would show when the mirror fogged up.

30. On March 19, 2021, the FBI was made aware that Morris had applied for a job with Department of Homeland Security (“DHS”) Federal Protective Service (“FPS”). The specific position Morris applied for was as a security guard with the contractor company, Paragon, which is contracted through FPS to provide security personnel for federal buildings.

31. As a result of Morris' application, a federal background investigation was initiated. This background investigation presented an opportunity to speak with Morris in an attempt to determine whether or not he or any of his associates were planning acts of violence.

32. On May 26, 2021, Morris was interviewed by the affiant, TFO Leblanc, and TFO Mark Atlee ("TFO Atlee") of FPS.

33. I was present for the entire interview. However, my presence was unknown to Morris for the first portion of the interview. I later made my presence and identification known to Morris.

34. Morris was interviewed in a conference room located within FPS space in the Norris Cotton Federal Building in Manchester, New Hampshire. This space requires key card access in order to gain entry. However, the doors/exits are not locked from the inside allowing anyone to exit at any time. Upon coming into the conference room, TFO LeBlanc introduced himself to Morris as a Federal Task Force Officer. Both TFO Atlee and TFO LeBlanc showed Morris their federal credentials. Morris was advised that he was free to go at any time. The interview began with TFO LeBlanc reminding Morris that knowingly providing false information or concealing material fact could be punishable under 18 U.S.C. §1001. Morris stated that he understood.

35. As a part of Morris' background investigation, he had previously filled out, signed, and dated SF85P, a questionnaire for public trust positions, in which his signature certified he was providing true statements to the best of his knowledge.

36. TFO Atlee began the interview by explaining to MORRIS that TFO Atlee was going to review the SF85P with Morris to see if Morris had any updated information, if he wanted to change any answer, or provide any additional information. At the time of the

interview, TFO Atlee did not have the actual SF85P that Morris had filled out and signed. TFO Atlee read each section/question from a blank SF85P to Morris.

37. Morris advised that he had no updated information or answers other than what Morris listed or answered on the SF85P. At the conclusion of reviewing each section of the SF85P, Morris indicated that he was satisfied with his original answers and that he did not wish to make any changes.

38. Prior to the interview, TFO LeBlanc had drafted a questionnaire with a series of questions to ask Morris during this interview.

39. TFO LeBlanc asked Morris about his social media. He was specifically asked, “What social media applications, messaging applications, do you use or have you used? Social media includes both encrypted and non-encrypted apps to include but not limited to: Facebook, Twitter, Instagram, Telegram, Snapchat, Whatsapp, Signal.” Morris was also asked to provide any screen names/username for all social media accounts.

40. Morris advised he had a Facebook, Instagram, Snapchat, and maybe a Twitter account.

41. TFO LeBlanc then confirmed with Morris that he did not have or ever have Telegram, Whatsapp, Signal or any other app that was not mentioned. Morris stated he did not.

42. TFO LeBlanc next asked Morris questions pertaining to associations with extremist groups and/or gangs. TFO LeBlanc read/asked Morris the following: “The following are a list of various groups, ideologies, extremists, gangs, etc., as defined by various open sources. The following lists are known at the national, regional, and/or local geographic level. Have you ever been a member of or associate of any of the following or similar groups?” TFO

Leblanc explained to Morris that member/associate includes full membership, probationary member, hang around of any chapter, club, etc.

43. TFO LeBlanc then read to Morris each of the groups that were listed. The groups were comprised into categories (Outlaw Motorcycle Clubs, Street/Prison Gangs, Other Extremist Groups/White Nationalist, etc.). Morris was asked to give a yes or no answer to each individual name as each one was read. Morris answered “no” to every name that was read to him. Specifically, under the section of “Other Extremist Groups/White Nationalist,” Morris said “no” to Nationalist Socialist Club/NSC 131.

44. Morris was then asked the following question: “In the last 12 months, have you had any contact with local, state, or federal law enforcement, whether physical or telephonic?” Morris answered yes to this question.

45. Morris explained that he had to contact the Kingston, NH Police Department in reference to a car accident in which he was involved. Morris further advised he called the Salem, NH Police Department to inquire about legal places to shoot guns outdoors. Morris added that he

may have also contacted other local police departments to make similar inquiries about gun laws and shooting.

46. Morris said that was all he could remember as far as law enforcement contacts. TFO Atlee then followed up and asked Morris something similar to, “What about federal law enforcement. Have you called any federal law enforcement agencies such as the ATF or others?”

47. Morris responded and said that he “might” have called the ATF and/or the NH State Police. Morris indicated that “if” he had called either of these agencies, the calls would have also been firearms related.

48. TFO LeBlanc explained to Morris that the questionnaire was completed and that he would now have an opportunity to review his answers to make sure they are complete and accurate. TFO LeBlanc handed Morris the entire document and reviewed Morris’ answers with him. Morris indicated that he had no corrections or additional answers.

49. Morris was then asked to sign the document to certify that he had reviewed it and that everything was true, complete, and correct to the best of his knowledge. Morris was also reminded again that providing false information could be punishable under 18 U.S.C. § 1001.

Morris signed and dated the document. After signing the document, Morris then gave the document back to TFO LeBlanc.

50. TFO LeBlanc then asked Morris something similar to, “Are you sure you don't want to make any changes, corrections, or provide any additional information?” Morris indicated that he did not.

51. After several reminders by TFO Leblanc that this was Morris’ last opportunity to make any corrections or provide additional information, TFO Leblanc asked Morris, “Who is Coil?”

52. Morris responded by advising TFO Leblanc and TFO Atlee that he would like to leave. TFO LeBlanc told Morris again that he was free to go, and he did not have to answer any questions; but if he wanted, he may want to stay to listen to what agents had to say so that Morris could have a full understanding of what was going on. Morris advised he would stay and speak with agents.

53. At this time, your affiant made Morris aware of their presence. I then showed Morris pictures of the aforementioned items that Morris had received in the mail. Morris insisted that he had purchased these items for reenactment.

54. I then showed Morris screenshots of the aforementioned EMA1 posts authored by EMA1 user “Coil.”

55. After an initial denial, Morris acknowledged that he wrote the Telegram messages, and that he was EMA1 user “Coil.” Morris stated that he wrote those messages as a form of “dark humor,” and the threats were not real.

56. Morris then explained that he is a “white nationalist,” and that he was proud of his European descent and heritage. Morris insisted that he would never hurt anyone, and that if he had knowledge of anyone planning to hurt anyone, he would contact the police.

57. Morris acknowledged that he was not truthful, but he did not offer any explanation for the false and misleading information that he had provided. Morris stated that he realized he “put himself in a bad position” by lying, and he asked what he could do to help the situation. Morris stated he did not want to be a felon.

58. Morris was asked if he would provide information or potential acts of violence being planned by NSC/131. Morris was also asked about the leader of NSC/131.

59. Morris said that members of NSC/131 would not hurt anyone. He advised they “sit around, smoke weed, and place stickers.” Morris stated he gets frustrated by members of NSC/131 because they dislike minorities because minorities are “degenerates” who abuse drugs and that NSC/131 is acting “just like them” by smoking “weed” all the time.

60. Morris advised he did not know the real name of the NSC/131 leader. Morris was asked if he could show the affiant and TFO’s the NSC/131 leader’s EMA1 page. Morris was hesitant to do this but eventually agreed. As Morris took his phone out of his front pocket, he turned his body and shielded his phone out of sight. Morris then quickly showed TFO LeBlanc and the affiant his phone, which appeared to show a EMA1 user page. Morris then quickly concealed his phone with his body again and put the phone back in his pocket.

61. Your affiant then asked Morris if he would be willing to call the NSC/131 leader. Morris said he would but advised he did not have their phone number. It was then suggested Morris could call the leader via the EMA1 application. Morris agreed to do this, but when he was

advised the call would be recorded, Morris advised he preferred to do the call only if his lawyer was present.³

62. Morris was asked earlier in the interview why, when he was asked about prior contacts with law enforcement, did he omit his phone call to the FBI when he inquired about being watchlisted. Morris advised he forgot about that phone call and did not omit it purposely.

63. Towards the end of the interview as Morris was leaving, Morris made a comment that he suspected something may happen during this scheduled interview. He went on to explain that the night before this interview he told his friend the Federal Government must be "incompetent" if they did a background investigation and did not learn that he was watchlisted.

64. Towards the end of June 2021, the FBI acquired a copy of Morris' completed SF 85P. The form includes an admonition about possible penalties for lying on the form, including that lying on the form could be a violation 18 U.S. Code § 1001:

Penalties for Inaccurate or False Statements

The U.S. Criminal Code (title 18, section 1001) provides that knowingly falsifying or concealing a material fact is a felony which may result in fines and/or up to **five (5)** years imprisonment. In addition, Federal agencies generally fire, or disqualify individuals who have materially and deliberately falsified these forms, and this remains a part of the permanent record for future placements. Your prospects of placement or security clearance are better if you answer all questions truthfully and completely. You will have adequate opportunity to explain any information you provide on this form and to make your comments part of the record.

It also includes a second acknowledgement that the individual completing the form understands that withholding, misrepresenting, or falsifying information on the form

³ Morris was not represented by counsel at the time of this interview. While speaking with Morris about making the aforementioned phone call on behalf of the FBI, Morris expressed a desire to have an attorney present while he made the call. Morris was advised that logistically it would not work to arrange for his attorney to be present every time the FBI needed his assistance. Due to Morris' statements regarding the presence of an attorney, the interview was ended at that time.

could subject the individual to penalties. Morris marked that he understood:

Statement of Understanding

PERSONS COMPLETING THIS FORM SHOULD BEGIN AFTER CAREFULLY READING THE PRECEDING INSTRUCTIONS.

I have read the instructions and I understand that if I withhold, misrepresent, or falsify information on this form, I am subject to the penalties for inaccurate or false statement (per U. S. Criminal Code, Title 18, section 1001), or removal and debarment from Federal Service.

Yes: { ☒ } No: { ☐ }

Sections 1-4 - Identifying Information

Provide your full name. If you have only initials in your name, provide them and indicate "initial only". If you do not have a middle name, indicate "No Middle Name". If you are a "Jr.," "Sr.," etc. enter this under Suffix.

Last: MORRIS First: KYLE Middle: Andrew Suffix:

Provide your date of birth

Month/Day/Year: 07/07/1999

Provide your Place of birth

City: Methuen County: Essex State: MA Country: United States

Provide your U.S. Social Security Number (Not Applicable: { })

003 - 92 - 6754

65. The form contains a series of questions about the applicant's involvement in terrorism and provides the following definition of terrorism:

The following pertain to your associations. You are required to answer the questions fully and truthfully, and your failure to do so could be grounds for an adverse employment or credentialing decision. For the purpose of this question, terrorism is defined as any criminal acts that involve violence or are dangerous to human life and appear to be intended to intimidate or coerce a civilian population to influence the policy of a government by intimidation or coercion or to affect the conduct of a government by mass destruction, assassination or kidnapping.

66. One of the questions asks whether the applicant "EVER advocated any acts of terrorism." Morris checked the "No" option:

Advocating Acts

Have you **EVER** advocated any acts of terrorism or activities designed to overthrow the U.S. Government by force?

Yes: { ☐ } No: { ☒ }

67. Morris is known to rent out rooms in his residence. At various times, there have been up to three renters observed at one time.

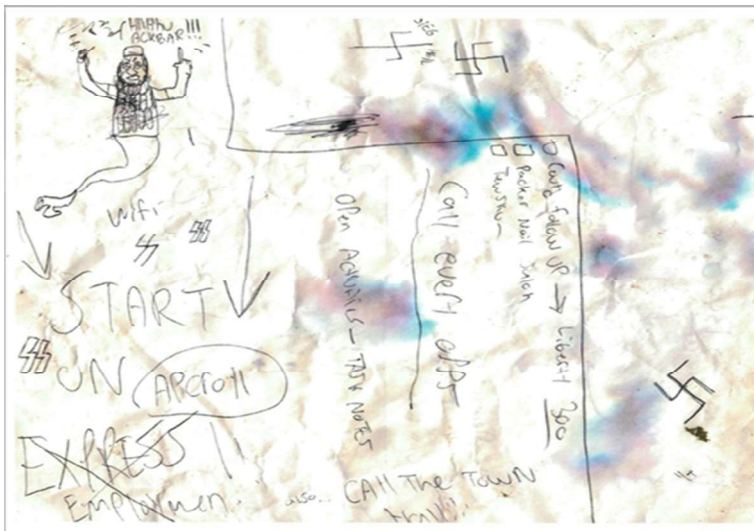
68. On June 12, 2021, approximately two and a half weeks after Morris was interviewed, Morris was observed via surveillance throwing what appeared to be two computer towers in the trash barrels sitting at the end of the driveway at the Residence by the street.

69. Given this observation, on June 15, 2021, TFO Leblanc and I conducted a trash pull of items in the trash barrels at the end of the driveway of the Residence. No computer towers were located, but we did find a Samsung Galaxy S8 cellphone in one of the trash barrels that looked similar to the one Morris showed me and the TFOs in the interview. The phone had a lot of damage that appeared someone purposely tried to smash and destroy the cellphone.

70. The cellphone was located amongst other papers that looked like notes Morris may have taken while working for Comcast. Many of the notes contained doodles of well-known Nazi symbols.

71. One paper had what appeared to be a picture of a genie coming out of a lamp, wearing a suicide bomber vest with the phrase “Allahu Akbar!!!” written next to it.

72. In my training and experience, this is a drawing of a terrorist suicide bomber, and further illustrates Morris’ interest in violent terrorist activity. A photo of this specific paper is below:



73. The FBI was able to repair and extract data from the Samsung Galaxy S8 cellphone. The Samsung Galaxy S8 cellphone appeared to contain data from some time in 2018 through September of 2020. The Bluetooth device name given to the phone was “Kyle’s S8.” The name “Mom” with phone number 603-275-7104 was found in the “Contacts” section. Open source searches of that phone number reveal it belongs to Nancy Morris, who is known to be Morris’ mother.

74. Furthermore, the Samsung Galaxy S8 cellphone contained Morris’ EMA1 account with username “Coil,” a Snapchat account with username “kylemorris911,” videos and “selfie” photos that appear to be taken by Morris, as well as messages, both voicemails and texts, addressed to “Kyle”.

75. Data from the phone, in various forms, show Morris talking about acts of violence/terrorism in EMA1 chatrooms, what appear to be specific notes containing plans of how to carry out acts of violence/terrorism, information on how to create explosives, information on tools and steps to convert a rifle to fully automatic, a chat showing Morris attempted to sell a fully automatic rifle he owned to another EMA1 user, and evidence that Morris smoked marijuana and grew his own marijuana plants during the same time period he was purchasing firearms.

76. During one EMA1 chat between Morris and another unidentified EMA1 user (UNSUB 1), Morris and UNSUB 1 appear to be introducing themselves and discussing their mutual white nationalist beliefs. Morris initially advised during these early introductory conversations that he does not support genocide:

Coil



I just want to make it clear to you that I'm not down to hurt anyone who isn't a combatant. I'm a Libertarian race realist

6/12/2020 3:31:00 PM(UTC+0)

[Sources \(1\)](#)

Coil



Like Jared Taylor if he was a libertarian

6/12/2020 3:31:13 PM(UTC+0)

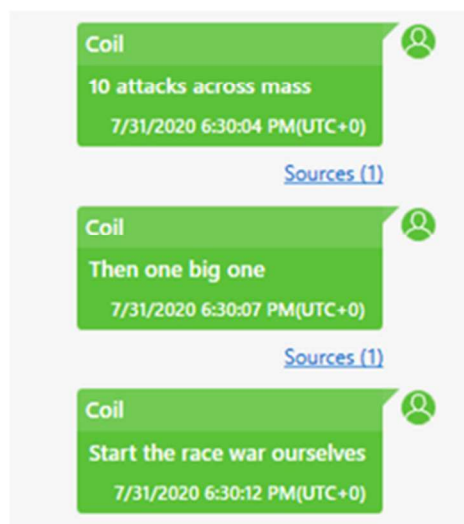
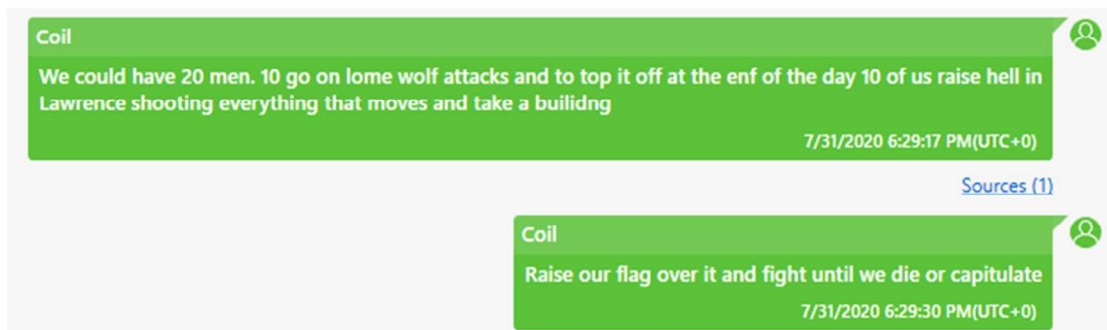
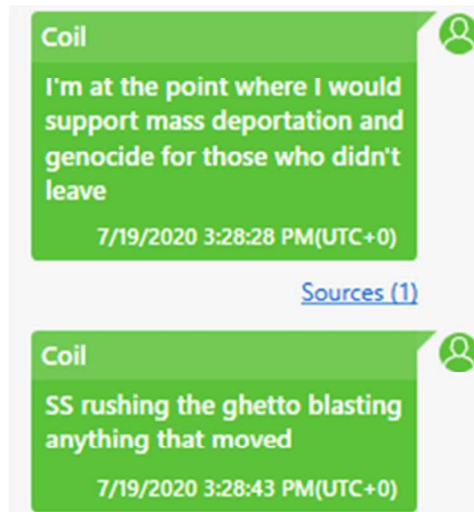
Coil



No not anyone specific. My views are that race clearly exists. But I don't beleive in genocide or anything

6/12/2020 4:47:10 AM(UTC+0)

77. Later EMA1 chats between Morris and UNSUB 1, including the aforementioned chats previously provided by the CHS, show Morris appearing to advocate for acts of violence:



Coil
Mosques, Synagogues, Diversity centers and businesses that hire non whites
7/31/2020 6:31:03 PM(UTC+0)
[Sources \(1\)](#)

Coil
Politicians
7/31/2020 6:31:06 PM(UTC+0)
[Sources \(1\)](#)

Coil
Then take a symbolic building
7/31/2020 6:31:12 PM(UTC+0)

Coil
And raise the new england flag and swastika over it
7/31/2020 6:31:27 PM(UTC+0)

Coil
We could have someone drive a truck into the state house and blow up
7/31/2020 6:31:59 PM(UTC+0)

Coil
Then 9 other attacks
7/31/2020 6:32:04 PM(UTC+0)

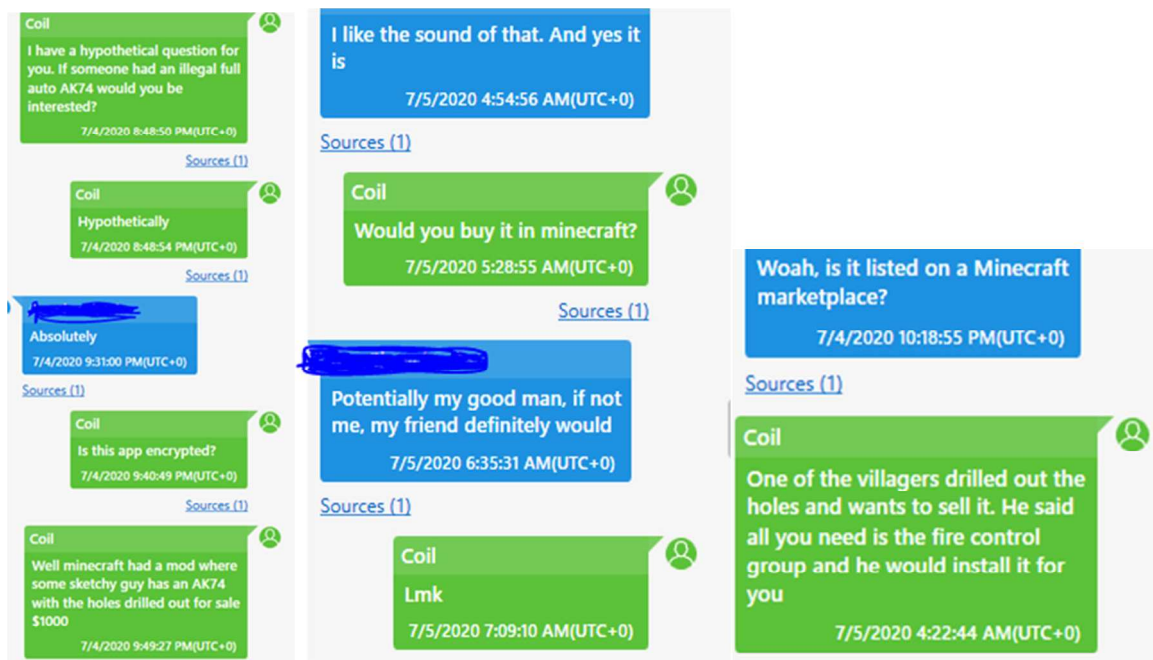
Coil
Our generation will eliminate the "clutter" once and for all
8/2/2020 3:50:47 AM(UTC+0)

Coil
After my sister stopped talking to me I really tried to see it from her point of view. I tried to "deradicalize" myself if you will. I did that for 2 days. I watched "holocaust" documentaries and listened to blacks talk about their issues. Not only did my views not change but now they're more solid then they ever were. It's utter bullshit and constant garbage that they spit out. We have kept the exact same narrative for hundreds of years. I encourage you to put yourself in the enemies shoes. I want death squads. Hail Victory! 🇺🇸🇺🇸🇺🇸🇺🇸🇺🇸🇺🇸🇺🇸
8/8/2020 4:05:57 PM(UTC+0)

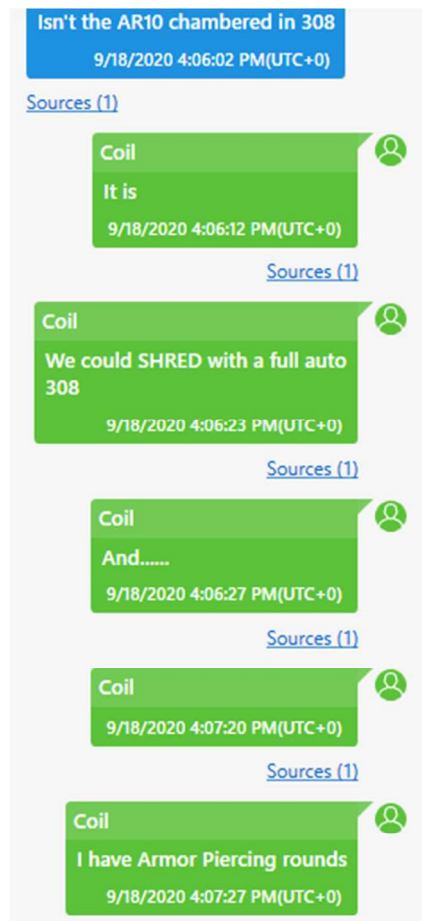
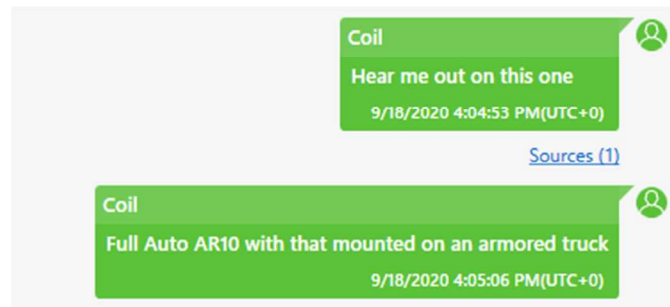
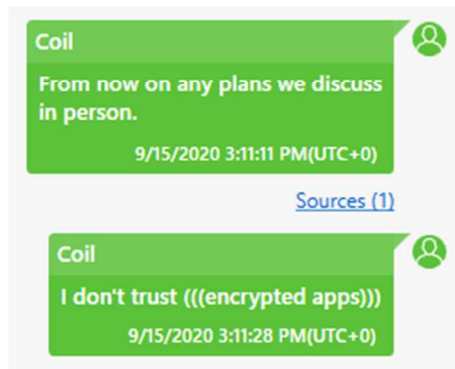
78. Based upon my training and experience, review of the SF85P, and review of Morris' chats, I believe that this statement appears to be advocating for an act of terrorism, as defined on the aforementioned SF85P. Thus, I believe that Morris made a material false

statement when he marked “no” to the question asking whether he had ever advocated acts of terrorism.

79. Other messages show what appears to be Morris trying to sell a fully automatic “AK74” to UNSUB 1. During this chat the term “in Minecraft” is used. In my training and experience, the term “in Minecraft” is used in chatrooms to protect the author from potential prosecution when making threats, statements of violence, or statements regarding other illegal activity:



80. In further conversations between Morris and UNSUB 1, Morris discusses not trusting encrypted applications, fully automatic weapons, and owning armor piercing rounds:



81. Also found were messages between Morris and someone identified as Connor Regan (Regan) in which Morris talks about being an “accelerationist”:

Is accelerationism poking at shit to start a war?

Participant	Delivered	Read	Played
[REDACTED]			

Status: Sent

6/17/2020 5:23:07 PM(UTC+0)

Source Info:
userdata (RsdQ)RootUser_deQcom.android.providers.telephony/databases/mmsms.db : 0c9559f9 (Table: sms, Size: 12279505 bytes)

From: + [REDACTED] (owner)

And building chemistry and friendships with your squad to the point where you can trust your life with them and know where they are and what they're doing

Participant	Delivered	Read	Played
Unknown			

Status: Read

Delivered: 6/17/2020 5:23:14 PM(UTC+0)

6/17/2020 5:23:13 PM(UTC+0)

Source Info:
userdata (RsdQ)RootUser_deQcom.android.providers.telephony/databases/mmsms.db : 0c9559c3 (Table: sms, Size: 12279505 bytes)

15

From: + [REDACTED] (owner)

Yes

Participant	Delivered	Read	Played
Unknown			

Status: Read

Delivered: 6/17/2020 5:23:17 PM(UTC+0)

6/17/2020 5:23:16 PM(UTC+0)

Source Info:
userdata (RsdQ)RootUser_deQcom.android.providers.telephony/databases/mmsms.db : 0c955943 (Table: sms, Size: 12279505 bytes)

(owner)
To: [REDACTED]

I might be an accelerationist

Participant	Delivered	Read	Played
+16033056872 Connor Regan			

Status: Sent

6/17/2020 5:23:42 PM(UTC+0)

Source Info:
userdata (RsdQ)RootUser_deQcom.android.providers.telephony/databases/mmsms.db : 0c9557a5 (Table: sms, Size: 12279505 bytes)

From: [REDACTED] (owner)

An accelerationist wants the boog to start tmr and will actively try to start a war

To: [REDACTED]
 If I'm being honest I fit that description.

Participant	Delivered	Read	Played
+16033056872 Connor Regan			

Status: Sent
 6/17/2020 5:24:10 PM(UTC+0)

Source Info:
 userdata (SdC)/RootUser_de/Gcom.android.providers.telephony/databases/mmmsms.db : 0d55524 (Table: sms, Size: 12279505 bytes)

16

From: (owner) [REDACTED]
 Yes lol you seem like it. Just gotta tone it back. Your time will come. Believe me, I don't plan on dying of old age on my farm. But we have to be smart

Participant	Delivered	Read	Played
Unknown			

Status: Read
 Delivered: 6/17/2020 5:24:24 PM(UTC+0)
 6/17/2020 5:24:24 PM(UTC+0)

Source Info:
 userdata (SdC)/RootUser_de/Gcom.android.providers.telephony/databases/mmmsms.db : 0d55501 (Table: sms, Size: 12279505 bytes)

(own TO: [REDACTED])
 I think Timothy McVeigh is a good guy. (Besides the childrens deaths)

Participant	Delivered	Read	Played
+16033056872 Connor Regan			

Status: Sent
 6/17/2020 5:24:46 PM(UTC+0)

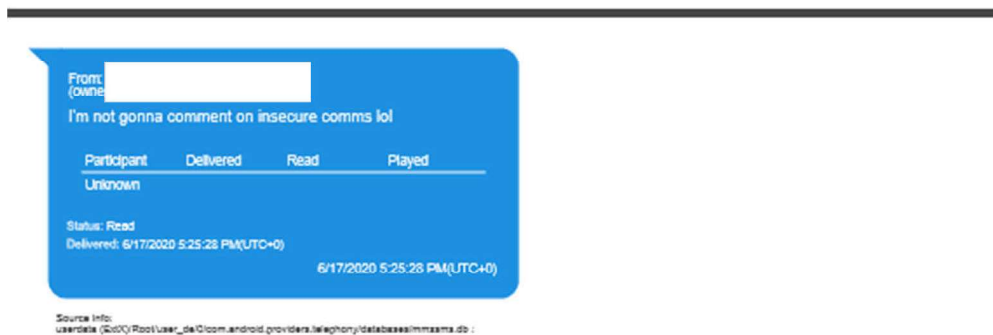
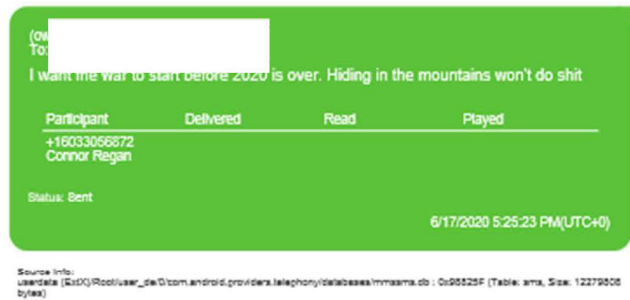
Source Info:
 userdata (SdC)/RootUser_de/Gcom.android.providers.telephony/databases/mmmsms.db : 0d55542 (Table: sms, Size: 12279505 bytes)

From: (owner) [REDACTED]
 I don't even plan on living in a free America. I plan on giving my life one day so that my kids and grandkids get to live in a free America

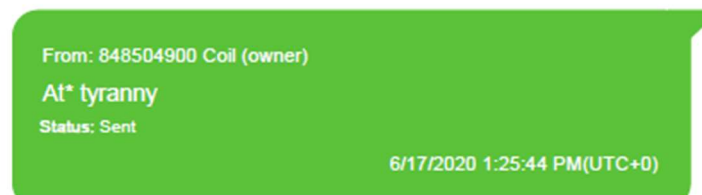
Participant	Delivered	Read	Played
Unknown			

Status: Read
 Delivered: 6/17/2020 5:24:49 PM(UTC+0)
 6/17/2020 5:24:49 PM(UTC+0)

Source Info:
 userdata (SdC)/RootUser_de/Gcom.android.providers.telephony/databases/mmmsms.db : 0d55528 (Table: sms, Size: 12279505 bytes)



82. In other messages, Morris talked about “striking at tyranny”⁴:



83. In a chat with a militia group, Morris talked about wanting the militia to be more proactive:

From: 848504900 Coil (owner)
 You guys are scared of the enemy. Let them come.
 Status: Sent
 6/17/2020 3:47:24 PM(UTC+0)

Source Info:
 userdata (ExtX)/Root/data/org.telegram.messenger/files/cache4.db : 0x971A6D (Size: 108457984 bytes)

42

From: 848504900 Coil (owner)
 If you don't want to be jeopardized why are you in a militia??
 Status: Sent
 6/17/2020 3:47:41 PM(UTC+0)

Source Info:
 userdata (ExtX)/Root/data/org.telegram.messenger/files/cache4.db : 0x9719A6 (Size: 108457984 bytes)

From: 848504900 Coil (owner)
 We have the right to abolish tyranny. You're either with it or your not.
 Status: Sent
 6/17/2020 3:51:05 PM(UTC+0)

From: 848504900 Coil (owner)
 They've already taken our guys from us! They've already attacked us. Are we just going to let Noah rot in jail? I'm nit discussing anything illegal on here. I'm just saying I'm ready now.
 Status: Sent
 6/17/2020 3:55:22 PM(UTC+0)

Source Info:
 userdata (ExtX)/Root/data/org.telegram.messenger/files/cache4.db : 0x972A00 (Size: 108457984 bytes)

From: 848504900 Coil (owner)
 I know you guys are all Patriots. But eventually we're going to have to do something or we'll just fade away
 Status: Sent
 6/17/2020 3:56:00 PM(UTC+0)

Ready is good. But the way you're talking about it is dangerous. We need to confine any and all discussion of things like that to in person discussion for the time being.

6/17/2020 3:57:36 PM(UTC+0)

Source Info:
userdata (ExtX)/Root/data/org.telegram.messenger/files/cache4.db : 0xd722CF (Size: 108457984 bytes)

From: 848504900 Coil (owner)

It's obviously dangerous. I was planning on dying. This is reality. This is what we have.

Status: Sent

6/17/2020 3:58:10 PM(UTC+0)

Source Info:
userdata (ExtX)/Root/data/org.telegram.messenger/files/cache4.db : 0x9721EB (Size: 108457984 bytes)

45

From: 848504900 Coil (owner)

We're all going to die anyways.

Status: Sent

6/17/2020 3:58:23 PM(UTC+0)

Source Info:
userdata (ExtX)/Root/data/org.telegram.messenger/files/cache4.db : 0x973364 (Size: 108457984 bytes)

From: [REDACTED]

Don't die needlessly. Don't die singularly. Don't jeopardize the mission of the organization.

6/17/2020 3:59:46 PM(UTC+0)

Source Info:
userdata (ExtX)/Root/data/org.telegram.messenger/files/cache4.db : 0x9732C8 (Size: 108457984 bytes)

From: 848504900 Coil (owner)

Why "play it safe" and just die of old age or in a prison. Fuck that.

Status: Sent

6/17/2020 3:58:51 PM(UTC+0)

Source Info:
userdata (ExtX)/Root/data/org.telegram.messenger/files/cache4.db : 0x973FA7 (Size: 108457984 bytes)

From: 848504900 Coil (owner)

What is the mission exactly??

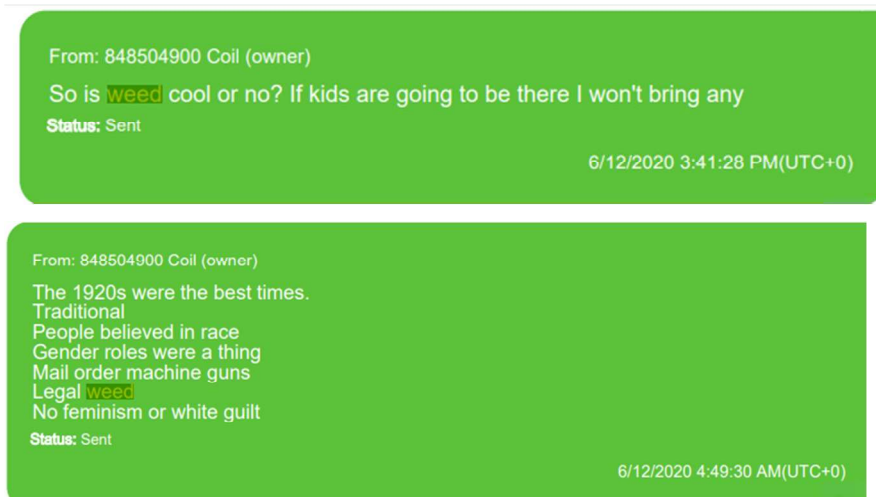
From: 848504900 Coil (owner)

I will talk to you guys on Tuesday but if we choose the path of cowardice I'm out.

Status: Sent

6/17/2020 4:02:42 PM(UTC+0)

84. In another chat, Morris talked about bringing "weed" to an event, and how the "best times" were when "weed" was legal in the 1920s:



85. Web Bookmarks, Searched Items, Notes from the Samsung Notes application, Images, Calendar Entries, Videos, and documents that were downloaded to the phone were also retrieved.

86. The extraction also recovered various “notes”, including the date they were written. The notes are a variety of topics, including: 1). fully automatic weapons and/or tools and parts needed to convert a weapon to fully automatic, 2). explosives and ingredients/materials needed to create explosives, 3). drug use and what appear to be items needed to grow marijuana, 4). advocating for and planning violence, Morris referring to himself as an “accelerationist”, and what appears to be a letter or manifesto regarding violence towards law enforcement and political officials. Some of the Notes are below:

<p>Created: 9/17/2019 12:30:37 PM(UTC+0)</p> <p>Modified: 9/17/2019 12:30:37 PM(UTC+0)</p>	<p>Title: Source: Samsung Notes Labels: Body: Dear Officer, Federal Agent, Active Military, Census Taker, Senator, Congressman, etc...: "I Don't Want To Kill You! Dear Officer: I don't want to kill you. I don't even want to wound you. I admire your courage and the commitment you've made to help others, often at risk of own your life. I hope you won't come for me, because if you do, one of us will die. It may be you. I've done nothing wrong. I don't intend to. But the government which you serve has passed too many laws. I am sure to accidentally break one, some day. And that same government is systematically destroying the unalienable rights which our Constitution says may not be infringed very specifically, my right to keep and bear arms. I am not some wacko lunatic, but I can no longer stand idly by, while decent people are systematically enslaved by an out-of-control government. I cannot allow a corrupt judiciary to use its power to destroy my rights</p>
--	--

	<p>and my country. That government and that judiciary has begun to use you to arrest, and kill, people just like me: people who believe that the Declaration of Independence, the Constitution and the Bill of Rights mean what they say. You don't know me, but you see me every day. I may be a businessman, a truck driver, an executive. I could be a housewife or a salesman. But I am armed, as Americans have been for over 250 years, and I am determined to keep the freedoms which only an armed people may retain. With a rifle, I can hit a man-sized target at 800 yards. At shorter distances, in the blink of an eye, I can hit a head-size target with a rifle or a handgun. I don't wear a uniform. I don't drive a marked car. I don't wear camouflage. I could be your own secretary, or your barber. I might be the guy who delivers your bottled water, or the parcel delivery lady. You don't know who I am, or what arms I have, and you never will. I am tens of millions. I am America. But I know you.</p>
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I know your uniform, your car, and your work schedule. I know where you work, and where you live. And that is good for you, because not only am I no threat to you, so long as you do the job for which you are hired. I am also prepared to assist you when you are threatened by real criminals. You may think that there aren't many of me left, but believe me, there are many, many more than you can imagine. When the chips are down, we are the ones who are truly on your side. On your side, that is, so long as you honor your Oath. We are on your side if you are one of the majority of peace officers who are not corrupt and who have not sold out to the socialists and communists freedom betrayers who will do anything, say anything to destroy the America our fathers and grandfathers bequeathed us. No, I am no threat to you, but your bosses in government don't see it that way. They think that I, and my arms, are a threat to them, and they are planning to send you for me, just as they've sent armed, dangerous officers on select little missions for years, taking out targeted individuals. On their orders, you may succeed in murdering me for my beliefs. Or you may not. Whether or not you succeed in murdering me, as federal agents murdered Vicki Weaver and her young son in Idaho; or as those same federal agents murdered 81 men, women and children at Waco, Texas; there will be others who will rise up in my memory, as I now rise up in honor of the innocent lives taken by the jack-booted thugs and black-clad imitation ninjas who think it is fun to murder Americans who have somehow become convinced that it is their job to murder Americans! I am prepared to die, honoring my sacred Oath as an American, to defend and protect the Constitution of the United States of America. Are you prepared to die to violate the Oath that you took? You see, our government is out of control. It has rotted, from the top down. You know it. You've seen it. But you, like many others, have been too concerned with your job, your family, and your pension, to say or do anything about it. Deep down, you know I am right. But you think you must follow orders. Or must you? Are you going to murder me for having the courage to stand up for the country and the principles in which you believe? Are you going to go along with unconscionably illegal, unconstitutional orders, just as "good" German soldiers followed their orders? Are you going to be a peace officer or a jack-booted thug? There is little difference between a street outlaw who murders and robs; and a uniformed thug who murders and robs under color of law. The result is the same: Property confiscated, lives ruined, families ripped apart, murder committed, and a free nation destroyed. Look at history. Look around the world. As we move toward a lawless society, our country moves closer and closer to anarchy and then some form of fascism. Are you going to enforce unconstitutional laws?

Are you going to be the private army of socio/fascist dictators who masquerade as democratic representatives? Or are you going to do your part to recapture America? Are you going to keep your eyes and ears open? Will you quietly let me know when the jack-booted thugs in the SWAT teams have targeted me? Will you let your fellow officers know that they are being sold down the river by their corrupt masters? Don't come to kill me. Because I don't want to kill you. If you do come, you may succeed, if you get lucky. But don't count on luck, because it will probably be hard... damned hard. Like millions of other Americans, I am the son or daughter of a nation of riflemen citizen-soldiers who have a rich heritage of beating the best the enemy can send against us. We are resourceful. We cherish our homes and freedom. We understand weapons and tactics. You are foolish if you intend to be our

enemy. If you don't succeed, and in the long run, you won't, here's what you can expect if you push us to no other defense: ambushes of SWAT teams, and the wholesale slaughter of all the jack-booted thugs who have murdered innocent Americans on the orders of their socialist masters; targeted assassinations and kidnappings of anti-Constitution judges, and assassinations of anti-American, anti-gun politicians. By your willingness to be a good little Nazi, you will have unleashed a civil war. This is just what America's enemies want. It doesn't have to be that way. You can do something about it. It's easy. Read the Declaration of Independence, the Constitution and the Bill of Rights. Although you took an Oath to defend them, you don't learn much about them in your training, do you? Today, these documents are considered dangerous by the government, just as King George found them dangerous over 200 years ago. Why do you suppose your leaders lead you to oppose the very rights you swore to protect? Why do they want a disarmed public? You know the reason. It has nothing to do with controlling crime. It has everything to do with using you to disarm, fine, control, and ultimately murder your American fellows just like the brown shirts and the SS did to German citizens. Don't fall for it. Don't force me to kill you.

Created: 4/14/2019 6:14:00 AM(UTC+0) Modified: 4/14/2019 6:26:43 AM(UTC+0)	Title: AR Build Source: Samsung Notes Labels: Body: 16" [mid] 1:7 barrel (55)65-85(90) grains Mid Lenght gasNo front sight postAuto Lower Parties: Source file:
Created: 7/27/2019 1:10:44 PM(UTC+0) Modified: 7/27/2019 1:15:16 PM(UTC+0)	Title: AR-15 Automatic Conversion Source: Samsung Notes Labels: Body: Sons of Liberty Lower. 150?Automatic lower parts kit. 100?Automatic bolt carrier. 100?\$3501125492719Password:51548001 Parties: Source file: userdata (ExtX)/Root/data/com.samsung.android.app.no tes/databases/sdoc.db : 0xDC4F47 (Table: sdoc, Size: 1781760 bytes)
Created: 7/14/2019 8:41:07 AM(UTC+0) Modified: 7/14/2019 8:47:38 AM(UTC+0)	Title: Kit Source: Samsung Notes Labels: Body: Head set/earbudLightweight Plate carrier -6 mag pouches -IFAK communication Breathable pants/combat pantsBreathable underwear for running/sweatBreathable socks/sweat absorbent Breathable light bootsAR with EOTech/zoom(300m combat)Ak foldable (200m)Remington 700(400m +) pick them off then move.Assault pack (optional)Pipe bombsThermite Molotov Parties: Source file: userdata (ExtX)/Root/data/com.samsung.android.app.no tes/databases/sdoc.db : 0xD4F6B (Table: sdoc, Size: 1781760 bytes)
Created: 7/13/2019 11:06:33 AM(UTC+0) Modified: 7/13/2019 11:06:33 AM(UTC+0)	Title: Auto AR-15 Source: Samsung Notes Labels: Body: 80% LowerAR-15 Jig Full Auto Parties:

Created: 4/10/2019 12:42:28 PM(UTC+0) Modified: 4/10/2019 12:50:01 PM(UTC+0)	Title: Stash Firearms Source: Samsung Notes Labels: Body: Pick up AR and wrap it in trash bags then throw Walmart bags on itBuy multiple locksBuy cheap ammo cansHide everything besides the 870Lock away ammo and military items in ammo boxes/tough boxIdeas where to hide:Tub/tough boxAk in the couchAr broken down in tough boxCVA in couch?/register?American Winchester bookshelf Parties: Source file: userdata (ExtX)/Root/data/com.samsung.android.app.notes/databases/sdoc.db : 0x9499A (Table: sdoc, Size: 1781760 bytes)
Created: 2/17/2019 5:20:39 AM(UTC+0) Modified: 2/17/2019 5:21:01 AM(UTC+0)	Title: Source: Samsung Notes Labels: Body: You guys bitch about everything. No wonder our race is going extinct. If you want something you have to man the fuck up and take it. If you have time to bitch in the computer then you have time to PRESERVE THE EXISTANCE OF OUR PEOPLE. Read more learn more dominate the world. Parties: Source file: userdata (ExtX)/Root/data/com.samsung.android.app.notes/databases/sdoc.db : 0x77845 (Table: sdoc, Size: 1781760 bytes)

Created: 4/27/2019 3:35:53 PM(UTC+0) Modified: 4/27/2019 3:36:02 PM(UTC+0)	Title: Full Automatic Conversion Source: Samsung Notes Labels: Body: Get colt M-16Full Auto LowerBuy Full Auto BoltBUT Full Auto lower partsBump Stock Parties: Source file: userdata (ExtX)/Root/data/com.samsung.android.app.notes/databases/sdoc.db : 0xA7F1E (Table: sdoc, Size: 1781760 bytes)
Created: 4/27/2019 3:32:57 PM(UTC+0) Modified: 4/27/2019 3:34:48 PM(UTC+0)	Title: Ammonium Nitrate Bomb Source: Samsung Notes Labels: Body: Ammonium NitrateNitromethane &Diesel fuel mixture(Oaklahoma city bombing)Make sure ammonium nitrate isn't the non explosive fertilizer. You can take ammonia and nitrate and mix it until you have the correct formula Parties: Source file: userdata (ExtX)/Root/data/com.samsung.android.app.notes/databases/sdoc.db : 0xA780C (Table: sdoc, Size: 1781760 bytes)
Created: 4/26/2019 5:14:20 PM(UTC+0) Modified: 4/27/2019 3:37:03 PM(UTC+0)	Title: IED Components Source: Samsung Notes Labels: Body: Exploder electric bix and electric match(Ignitor and ignitor) Parties: Source file:

Created: 7/10/2019 4:59:12 PM(UTC+0) Modified: 7/10/2019 5:07:41 PM(UTC+0)	Title: Source: Samsung Notes Labels: Body: SBR Ar15 10 magazines - 300 roundsExtra barrelGlock 19Pipe bombs x4 Swastika bannerThrow all in duffel bagDuffel bag with "camera equipmentAmmonium nitrate ton of shrapnelFilled with explosives 3 minute fuse.Pay b people to sign up for a liberal photo shoot where they are all in chains, chained together. Chain them to the wall.Have a photo shoot against "racism" chain them all to the wall.Put duffel bag on the ground (pull fuse) throw the swastika on the ground haul ass out of thereHave race traitors (DD, Jami) presentRun down to my car with AR duffel in trunk haul ass to the Mosque BOOM explosives go off and I'm already gonePanic and confusion and I'm already gone and headed to the mosque.Pull into empty spot. Prep explosives. Park next to the mosque and set fuse lock car and haul ass away. BOOM Head to streets of Manchester and pick off as many as you can before you're taken in by police. Parties:
Created: 7/14/2020 2:57:28 PM(UTC+0) Modified: 7/14/2020 9:58:33 PM(UTC+0)	Title: Army reserve/ Guard Source: Samsung Notes Labels: Body: Buy:2 Uniforms sewed patches 500(Med Short pants) (Med Short shirt)Small reg shirt)2 PCs 50New Boots 200New Flag4 Unit PatchesNew 20th PatchPersonal:Weigh.....174Stop smoking weed.....pass piss test.Get in shape... APFT ACFT standardsCAC card. Parties: Source file: userdata (ExtX)/Root/data/com.samsung.android.app.notes/databases/sdoc.db : 0x182D10 (Table: sdoc, Size: 1781760 bytes)
Created: 7/7/2020 3:53:54 PM(UTC+0) Modified: 7/7/2020 4:17:43 PM(UTC+0)	Title: Resignation Source: Samsung Notes Labels: Body: I am resigning from my team leader position and leaving the New England Minutemen.The first time we got opposition we cowered. I have heard every excuse in the book. We hide when shit gets real and we bow down to BLM and the government. We removed a patriot from the group because he broke the law.... you see how fucking ironic that is? Peace is not an option for me. I guess I'm an "accelerationist". The people who ruined our country need to be executed. Our martyrs need to be avenged. They already started the war. The majority of you don't want to risk losing your families and I understand. I don't have anything against any of you. I still consider you all my friends even though one of you sent me a screenshots of others talking behind my back.If you want to join a New England secessionist movement that actually trains in guerilla warfare and isn't scared of our enemy. Message me. Fuck BLMFuck the government Fuck the police. All of them.Fuck traitors.Live Free Or Die. Parties:

Created: 9/17/2019 6:20:38 PM(UTC+0) Modified: 9/17/2019 6:33:32 PM(UTC+0)	Title: 74 conversion Source: Samsung Notes Labels: Body: Jig 200Auto Fire control groupAuto Selector ??Tapco retaining Plate??Dremel?????Drill?????????Drill bits??? Will my drill work?Dremel. Size?????Drill.Will Tapco retaining plate work?????Google if parts are compatibleTest parts.....Get my drill size.....Test my drill.....Practice making drill holesPractice dremelDremel at harbor freight??? Parties: Source file: userdata (ExtX)/Root/data/com.samsung.android.app.notes/databases/sdoc.db : 0xF1F57 (Table: sdoc, Size: 1781760 bytes)
Created: 9/17/2019 6:10:30 PM(UTC+0) Modified: 9/17/2019 6:15:38 PM(UTC+0)	Title: Source: Samsung Notes Labels: Body: Improvised suppressors for .22 rimfireMachine gun guy jig 200Dremel 80Drill 60Auto Fire control 100Full auto selectorAuto Bolt FtindustriesArms of america Parties: Source file: userdata (ExtX)/Root/data/com.samsung.android.app.notes/databases/sdoc.db : 0xF09E3 (Table: sdoc, Size: 1781760 bytes)
Created: 9/17/2019 6:20:38 PM(UTC+0) Modified: 9/17/2019 6:33:32 PM(UTC+0)	Title: 74 conversion Source: Samsung Notes Labels: Body: Jig 200Auto Fire control groupAuto Selector ??Tapco retaining Plate??Dremel?????Drill?????????Drill bits??? Will my drill work?Dremel. Size?????Drill.Will Tapco retaining plate work?????Google if parts are compatibleTest parts.....Get my drill size.....Test my drill.....Practice making drill holesPractice dremelDremel at harbor freight??? Parties: Source file: userdata (ExtX)/Root/data/com.samsung.android.app.notes/databases/sdoc.db : 0xF1F57 (Table: sdoc, Size: 1781760 bytes)
Created: 9/17/2019 6:10:30 PM(UTC+0) Modified: 9/17/2019 6:15:38 PM(UTC+0)	Title: Source: Samsung Notes Labels: Body: Improvised suppressors for .22 rimfireMachine gun guy jig 200Dremel 80Drill 60Auto Fire control 100Full auto selectorAuto Bolt FtindustriesArms of america Parties: Source file: userdata (ExtX)/Root/data/com.samsung.android.app.notes/databases/sdoc.db : 0xF09E3 (Table: sdoc, Size: 1781760 bytes)
Created: 8/10/2019 4:32:28 AM(UTC+0) Modified: 8/10/2019 4:33:53 AM(UTC+0)	Title: Source: Samsung Notes Labels: Body: Type 2 ATF explosives manufacture aAmmonium nitrate and flash powder3000fps explosive chargeElectronic detonator Parties: Source file: userdata (ExtX)/Root/data/com.samsung.android.app.notes/databases/sdoc.db : 0xBA577 (Table: sdoc, Size: 1781760 bytes)

Created: 7/13/2019 11:08:33 AM(UTC+0) Modified: 7/13/2019 11:08:33 AM(UTC+0)	Title: Auto AR-15 Source: Samsung Notes Labels: Body: 80% LowerAR-15 Jig Full Auto Parties: Source file: userdata (ExtX)/Root/data/com.samsung.android.app.notes/databases/sdoc.db : 0xD379F (Table: sdoc, Size: 1781760 bytes)
Created: 7/27/2019 1:10:44 PM(UTC+0) Modified: 7/27/2019 1:15:16 PM(UTC+0)	Title: AR-15 Automatic Conversion Source: Samsung Notes Labels: Body: Sons of Liberty Lower. 150?Automatic lower parts kit. 100?Automatic bolt carrier. 100?\$3501125492719Password:51548001 Parties: Source file: userdata (ExtX)/Root/data/com.samsung.android.app.notes/databases/sdoc.db : 0xDC47 (Table: sdoc, Size: 1781760 bytes)
Created: 2/5/2020 8:37:04 PM(UTC+0) Modified: 2/5/2020 8:37:04 PM(UTC+0)	Title: Source: Samsung Notes Labels: Body: Digital scaleLight bulbsHumid PacketsOdor eliminatorWater Parties: Source file: userdata (ExtX)/Root/data/com.samsung.android.app.notes/databases/sdoc.db : 0x12FF75 (Table: sdoc, Size: 1781760 bytes)

Created: 1/29/2020 11:28:58 PM(UTC+0) Modified: 1/29/2020 11:45:12 PM(UTC+0)	Title: Source: Samsung Notes Labels: Body: Woke up at 9amRest area on waysFell asleep at 19Grab weed Parties: Source file: userdata (ExtX)/Root/data/com.samsung.android.app.notes/databases/sdoc.db : 0x12AF7B (Table: sdoc, Size: 1781760 bytes)
Created: 1/19/2020 4:15:55 AM(UTC+0) Modified: 1/19/2020 4:16:29 AM(UTC+0)	Title: Source: Samsung Notes Labels: Body: Bowl X2Grinder X2Raw rollers Waters Parties: Source file: userdata (ExtX)/Root/data/com.samsung.android.app.notes/databases/sdoc.db : 0x12099E (Table: sdoc, Size: 1781760 bytes)
Created: 7/18/2020 11:08:15 PM(UTC+0) Modified: 7/18/2020 11:08:15 PM(UTC+0)	Title: Source: Samsung Notes Labels: Body: We took Edibles at 19:05 Parties: Source file: userdata (ExtX)/Root/data/com.samsung.android.app.notes/databases/sdoc.db : 0x1847A5 (Table: sdoc, Size: 1781760 bytes)
Created: 8/23/2020 7:34:58 PM(UTC+0) Modified: 8/25/2020 2:54:00 PM(UTC+0)	Title: CC 1,200 Source: Samsung Notes Labels: Body: 1,ahu022.89 Last transaction 89.14 I paid 22.89 so it would be even 1000 mlm 1k 284.95 Amazon grow tent and light Paid 84.95 to keep it at 1200 Parties: Source file: userdata (ExtX)/Root/data/com.samsung.android.app.notes/databases/sdoc.db : 0x1A2F59 (Table: sdoc, Size: 1781760 bytes)

Created: 8/26/2020 3:29:00 PM(UTC+0) Modified: 9/20/2020 9:47:23 PM(UTC+0)	Title: Plants Source: Samsung Notes Labels: Body: August 22 Put seeda in water August 24 13:00 put seeds in paper towel August 24 Planted seeds 1/2" in happy frog potting soil. Aug 26 11:25 #1 1.25" #2 1.12" #3 1.4" MlmAll 3 sprayed August 28th 03:00 #1 2" #2 1.75" #3 2.25" August 28 20:23 #1 2.6" #2 2" #3 2.7" September 1st 17:11 #1 3" #2 2.25" #3 3" September 8th 22:00 All are transplanted. September 15th: 18/6 light shedule started Parties: Source file: userdata (ExtX)/Root/data/com.samsung.android.app.no tes/databases/sdoc.db-wal : 0x384BD (Table: sdoc, Size: 1048576 bytes)
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Created: 8/26/2020 7:21:10 AM(UTC+0) Modified: 8/27/2020 5:12:08 PM(UTC+0)	Title: Planting guide Source: Samsung Notes Labels: Body: Germinating Stage: -Put seed in PH balanced water for 24 hours. -Put into paper towel wet, seeds spread out and put into a bag -Check the bag every 12-24 hours -When seeds root is 1/2" it is done. -Place into a 1/2" hole tap root down. (This should be in a red solo cup with soil) ***When it sprouts it is in Veg stage??** Seedling Stage: Sprouts in solo cup Leave it in the red solo cup until its filled with roots then transplant to the 1 Gallon. Vegetative Stage: Light 18/6 -Train any branches that get to long by pulling them down away from center of plant? -Transport to 1 gallon with Frog fertilizer leave it for 2-4 weeks (the guy said he would probably do 2 weeks. -Transpalnt to 5 gallon with super soil And continue Veg phase for 2 weeks or how ever long you want----- ^^When it gets to be half the size you want it's time for flowering. Flower stage: Light 12/12 (when it's more dark it will start to produce buds). Harvest: When bud hair starts to turn brown/orange it's time to harvest Tips: -Google what the strain needs PH level? Nutrition? Heat? Parties: Source file: userdata (ExtX)/Root/data/com.samsung.android.app.no
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Created: 9/17/2019 6:20:38 PM(UTC+0) Modified: 9/17/2019 6:33:32 PM(UTC+0)	Title: 74 conversion Source: Samsung Notes Labels: Body: Jig 200Auto Fire control groupAuto Selector ??Tapco retaining Plate??Dremel?????Drill?????????Drill bits??? Will my drill work?Dremel. Size?????Drill.Will Tapco retaining plate work?????Google if parts are compatibleTest parts.....Get my drill size.....Test my drill.....Practice making drill holesPractice dremelDremel at harbor freight??? Parties: Source file: userdata (ExtX)/Root/data/com.samsung.android.app.notes/databases/sdoc.db : 0xF1F57 (Table: sdoc, Size: 1781760 bytes)
Created: 9/17/2019 6:10:30 PM(UTC+0) Modified: 9/17/2019 6:15:38 PM(UTC+0)	Title: Source: Samsung Notes Labels: Body: Improvised suppressors for .22 rimfireMachine gun guy jig 200Dremel 80Drill 60Auto Fire control 100Full auto selectorAuto Bolt FtfindustriesArms of america Parties: Source file: userdata (ExtX)/Root/data/com.samsung.android.app.notes/databases/sdoc.db : 0xF09E3 (Table: sdoc, Size: 1781760 bytes)
Created: 6/10/2019 4:32:28 AM(UTC+0) Modified: 6/10/2019 4:33:53 AM(UTC+0)	Title: Source: Samsung Notes Labels: Body: Type 2 ATF explosives manufacture aAmmonium nitrate and flash powder3000fps explosive chargeElectronic detonator Parties: Source file: userdata (ExtX)/Root/data/com.samsung.android.app.notes/databases/sdoc.db : 0xBA577 (Table: sdoc, Size: 1781760 bytes)

87. Some of the Web Bookmarks from the phone were as follows:

Drilling holes in an undrilled AK-74 buttstock - The AK Forum	https://www.theakforum.net/forums/29-russian/99319-drilling-holes-undrilled-ak-74-gular-Snipe-butstock.html#/topics/99319	Chrome	7/15/2019
Electronic Detonator	https://www.google.com/amp/www.instructables.com/id/Electronic-Detonator/%3famp_page=true	Android Browser	3/6/2018

How To Hide Your Guns From The Feds	https://www.skilledsurvival.com/survivalists-guide-hiding-guns/	Android Browser	5/19/2018
How to Make Ammonium Nitrate From Household Chemicals	https://sciencenotes.org/make-ammonium-nitrate/	Android Browser	3/28/2018

Make a Cheap Electronic Detonator!	https://www.google.com/amp/www.instructables.com/Make-a-cheap-electronic-detonator!/%3famp_page=true								Android Browser	3/6/2018
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AK-47 Class II conversion jig.pdf	https://www.dropbox.com/s/0qzmism4k7d0563/AK-47%20Class%20II%20conversion%20jig.pdf?dl=0				/Mobile bookmarks				Chrome	9/18/2019
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88. I reviewed some of the Searched Items found on the phone. Some searches were related to weapons and explosives, and included references to pipe bombs, and “full auto conversion.” In my training and experience, “full auto conversion” refers to the process of converting a semi-automatic firearm (one bullet fires with one trigger squeeze) to a fully automatic firearm (firearm fires continuously as long as the trigger remains depressed).

89. Uzi’s and Mac 10’s are both semi-automatic submachine/pistol variant firearms. In my training and experience, parts can be purchased to convert both an Uzi and Mac 10 to a fully automatic firearm.

90. Weapons and Explosives Related Searches

9/3/2020 5:34:36 PM(UTC+0)			Chrome	When you build pipe bombs with her
9/3/2020 5:34:35 PM(UTC+0)			Chrome	When you build pipebombs with her
9/14/2020 2:37:05 AM(UTC+0)			Chrome	mac 10 full auto conversion
9/14/2020 2:35:30 AM(UTC+0)			Chrome	Uzi full auto parts

Marijuana Grow Related Searches

91. Many of the searches seen below reference questions regarding the steps, stages, and materials for growing marijuana. In my training and experience, I know that people use red solo cups, or similar cups, in the initial stages of growing marijuana. A representative sample of the Notes are below:

8/28/2020 3:34:01 PM(UTC+0)			Chrome	When to transplant out of red solo
8/26/2020 8:08:33 AM(UTC+0)			Chrome	When to transplant into 5 gallon
8/26/2020 4:07:20 PM(UTC+0)			Chrome	sterile storage tub
8/26/2020	8/26/2020 7:18:58 AM(UTC+0)		Chrome	How far should T5 light be from marijuana
8/26/2020	8/26/2020 8:04:02 AM(UTC+0)		Chrome	weed transplanf stage
8/26/2020 7:16:36 AM(UTC+0)			Chrome	Perfect marijuana temp
8/26/2020 7:18:07 AM(UTC+0)			Chrome	In the vegetatove stage how far above should light hang
8/25/2020	8/25/2020 5:17:35 PM(UTC+0)		Chrome	Growing marijuana light shedules
8/25/2020	8/25/2020 5:41:57 PM(UTC+0)		Chrome	Best PH level for marijuana
8/25/2020	8/25/2020 2:08:38 PM(UTC+0)		Chrome	best PH level for Marijuana
8/25/2020	8/25/2020 5:50:06 PM(UTC+0)		Chrome	How much weed will sour diesel plants get you
8/25/2020	8/25/2020 2:49:29 PM(UTC+0)		Chrome	Marijuana grow phases

9/15/2020	9/15/2020 3:15:34 AM(UTC+0)		Chrome	What week should you shit lights off weed
9/9/2020	9/9/2020 1:58:13 AM(UTC+0)		Chrome	Why is my marijuana plants falling

9/15/2020	9/15/2020 3:16:31 AM(UTC+0)		Chrome	How many weeks is Veg Stage
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8/30/2020 7:26:15 PM(UTC+0)		Chrome	What happens if you ise too much electricity
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8/30/2020 7:26:37 PM(UTC+0)		Chrome	Do the police get notified if you use alot of electricity
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8/30/2020 7:26:43 PM(UTC+0)		Chrome	Do the police get notified if you use alot of electricity
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8/27/2020 4:12:07 PM(UTC+0)		Chrome	How long in jail for growing marijuanna
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8/28/2020 6:52:34 AM(UTC+0)		Chrome	How long do seedlings stay in red solo cup
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92. Some of the documents downloaded to the phone, and notification if they were deleted, were related to drugs and weapons. For example, one was related to The Anarchist Cookbook, a book that contains guides and instructions for manufacturing explosives as well as information about manufacturing illicit drugs at home. Another was for AK47 Full Auto Conversion for Dummies, a pdf document, easily found on the internet, that explains how to convert an AK47 from a semi-automatic rifle to a fully automatic rifle. Some of these deleted documents are shown below:

ar15conversion manual.pdf

anarchist-cookbook-william-powell
(1).DELETED.pdf

Anarchist_Handbook.DELETED.pdf

AK47_Full_Auto_Conversion_for_Dummies.DELET
ED.pdf

USArmy-Explosives.DELETED.pdf

Home Workshop Explosives - Uncle
Fester.DELETED.pdf

IslamicTerroristExplosivesManual.DELETED.pdf

us-super-bowl-security-2009.DELETED.pdf 5

93. Various videos were extracted from the phone. A few videos from September 22, 2019, show Morris and another unidentified male in the woods shooting firearms. In one of the videos, Morris walks towards the camera with a handgun in his hand. Morris proceeds to say, “Make my day, Jew”, before sending the slide forward on the pistol and firing several rounds. Another video shows Morris with what appears to be a Kalashnikov rifle in his hands. Morris looks at the camera and says, “Allahu Akbar!”, then fires several rounds from the rifle. Another video from 3/15/2020 shows another unidentified male shooting what appears to be a fully automatic AR-15.

94. One video from June 11, 2020 appears to show, based on my training and experience, Morris and his estranged wife, Juliet Morris, smoking a marijuana cigarette. A video from August 22, 2020 appears to show Morris’ hand rummaging through a plastic grocery bag full of other plastic bags containing marijuana.

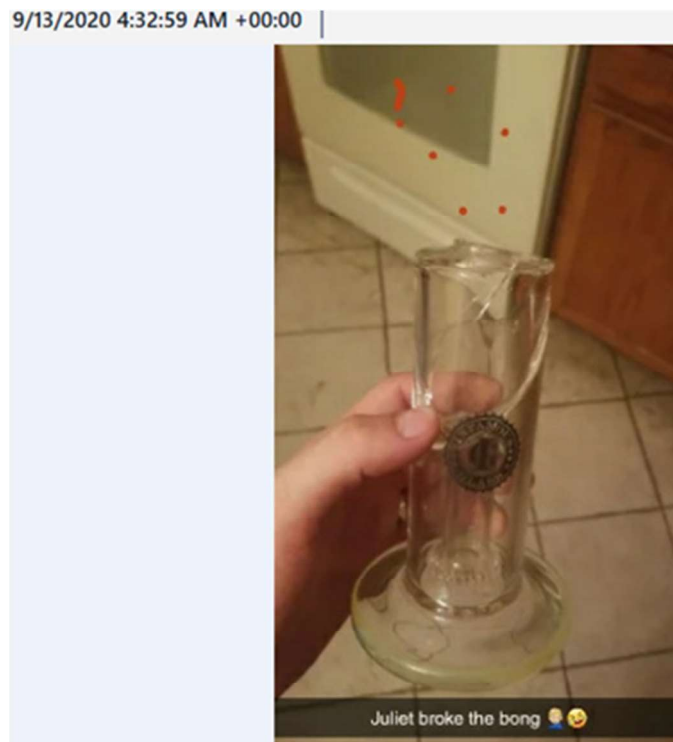
95. A video from September 3, 2020 shows what sounds like Morris talking about and showing that he is smoking marijuana out of a Red Bull can because his wife broke his bong. Based on my training and experience, I know a bong to be an apparatus used for smoking marijuana.

⁵ The 2009 Superbowl took place at Raymond James Stadium in Tampa, Florida; the same location as the most recent Superbowl in February of 2021.

96. Some “calendar entries” from the phone under the kyleisbuck@yahoo.com, appeared, in my training and experience, to relate to growing marijuana. A representative sample follows:

kyleisbuck@yahoo.com	Planted seeds at 1pm		8/22/2020 12:00:00 PM(UTC+0)
kyleisbuck@yahoo.com	1pm put seeds in paper towel and later put it in zip lock bag		8/23/2020 12:00:00 PM(UTC+0)
kyleisbuck@yahoo.com	Took it out of bag (half inch root) and planted it 23:35		8/24/2020 4:00:00 AM(UTC+0)

97. Images from the phone show numerous photos of what appears to be marijuana, marijuana paraphernalia, and marijuana grows. The dates on the images of the marijuana grows appear to be consistent with the calendar entries and web searches found on the phone regarding growing marijuana. Some of the images were as follows:



9/10/2020 5:12:45 PM +00:00 |



Mixing soils before transplant I got some nutrients too. I want to grow mega plants

7/19/2020 9:50:20 PM +00:00 |



6/10/2020 12:08:35 AM +00:00 |



5/24/2020 4:18:33 PM +00:00 |



8/29/2020 11:55:08 PM +00:00



8/26/2020 9:46:52 PM +00:00

DCIM



8/25/2020 5:47:05 PM +00:00

DCIM



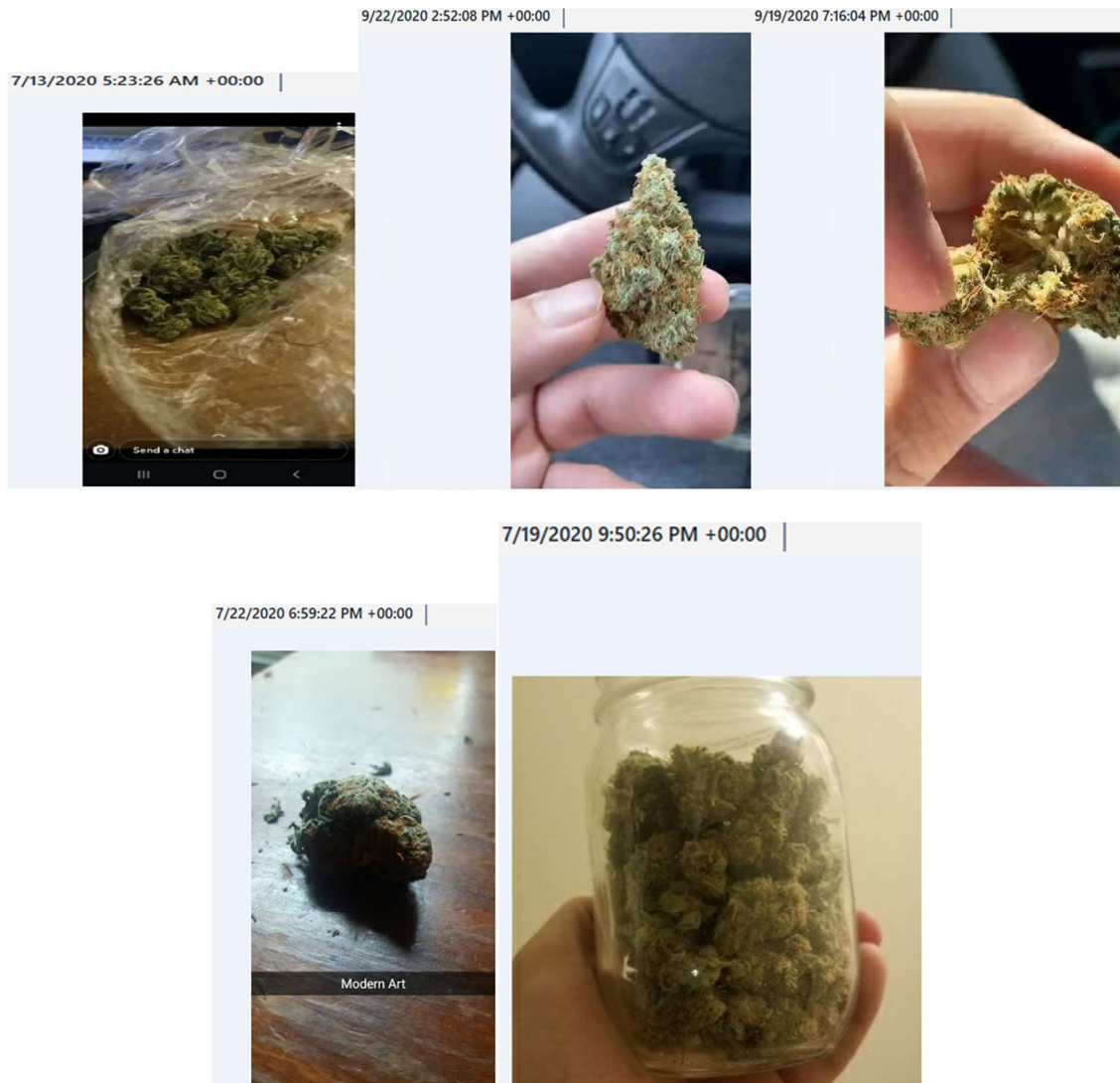
6/12/2020 3:05:13 AM +00:00



No place better to smoke than an island

9/22/2020 7:34:25 AM +00:00





98. Morris has purchased several firearms over the course of the last year or more, including as recently as August 27, 2021. ATF personnel provided me with ATF Form 4473s for Morris' firearm purchases from Next Level Firearms in Salem, NH and Shooters Outpost in Hooksett, NH. The ATF Form 4473s show Morris purchased firearms from Next Level Firearms on July 15, 2020 and July 17, 2020 among other dates.

99. On both 4473s for those dates, Morris answered question "e" by checking the "No" box, which asks whether the individual is an unlawful user of, or addicted to, marijuana or any other controlled substance:

11. Answer the following questions by checking or marking "yes" or "no" in the boxes to the right of the questions.		Yes	No
a. Are you the actual transferee/buyer of the firearm(s) listed on this form? Warning: You are not the actual transferee/buyer if you are acquiring the firearm(s) on behalf of another person. If you are not the actual transferee/buyer, the licensee cannot transfer the firearm(s) to you. Exception: If you are picking up a repaired firearm(s) for another person, you are not required to answer 11.a. and may proceed to question 11.b. (See Instructions for Question 11.a.)		<input checked="" type="checkbox"/>	<input type="checkbox"/>
b. Are you under indictment or information in any court for a felony , or any other crime for which the judge could imprison you for more than one year? (See Instructions for Question 11.b.)		<input type="checkbox"/>	<input checked="" type="checkbox"/>
c. Have you ever been convicted in any court of a felony , or any other crime for which the judge could have imprisoned you for more than one year, even if you received a shorter sentence including probation? (See Instructions for Question 11.c.)		<input type="checkbox"/>	<input checked="" type="checkbox"/>
d. Are you a fugitive from justice? (See Instructions for Question 11.d.)		<input type="checkbox"/>	<input checked="" type="checkbox"/>
e. Are you an unlawful user of, or addicted to, marijuana or any depressant, stimulant, narcotic drug, or any other controlled substance? Warning: The use or possession of marijuana remains unlawful under Federal law regardless of whether it has been legalized or decriminalized for medicinal or recreational purposes in the state where you reside.		<input type="checkbox"/>	<input checked="" type="checkbox"/>

21. Answer the following questions by checking or marking either the "yes" or "no" box to the right of the questions:		Yes	No
a. Are you the actual transferee/buyer of the firearm(s) listed on this form and any continuation sheet(s) (ATF Form 5300.9A)? Warning: You are not the actual transferee/buyer if you are acquiring the firearm(s) on behalf of another person. If you are not the actual transferee/buyer, the licensee cannot transfer the firearm(s) to you. Exception: If you are only picking up a repaired firearm(s) for another person, you are not required to answer 21.a. and may proceed to question 21.b.		<input checked="" type="checkbox"/>	<input type="checkbox"/>
b. Are you under indictment or information in any court for a felony , or any other crime for which the judge could imprison you for more than one year, or are you a current member of the military who has been charged with violation(s) of the Uniform Code of Military Justice and whose charge(s) have been referred to a general court-martial?		<input type="checkbox"/>	<input checked="" type="checkbox"/>
c. Have you ever been convicted in any court, including a military court, of a felony , or any other crime for which the judge could have imprisoned you for more than one year, even if you received a shorter sentence including probation?		<input type="checkbox"/>	<input checked="" type="checkbox"/>
d. Are you a fugitive from justice?		<input type="checkbox"/>	<input checked="" type="checkbox"/>
e. Are you an unlawful user of, or addicted to, marijuana or any depressant, stimulant, narcotic drug, or any other controlled substance? Warning: The use or possession of marijuana remains unlawful under Federal law regardless of whether it has been legalized or decriminalized for medicinal or recreational purposes in the state where you reside.		<input type="checkbox"/>	<input checked="" type="checkbox"/>

Based on the investigation, I believe Morris was untruthful when he completed these forms.

Synopsis

100. Based on the above information, the affiant believes there is probable cause to believe Morris violated Title 18 U.S.C. § 1001 when he stated on the SF85P that he has never advocated for acts of terrorism, that Morris knowingly possesses a fully automatic firearm in violation of 18 U.S.C. § 922(o)(1), that Morris made material false statements on multiple ATF Forms 4473 in the acquisition of a firearms in violation of 18 U.S.C. § 922(a)(6), and that Morris

is an unlawful user of or is addicted to a controlled substance while in possession of a firearm in violation of 18 U.S.C. § 922(g)(3).

101. Furthermore, as set forth above, there is probable cause to believe that Morris' electronic devices, residence, vehicle, and person contain evidence of the violations.

Firearms and Explosives

102. There is reason to believe that Morris is in possession of fully automatic firearms, explosives, and firearms purchased when Morris made material false statements on multiple ATF Forms 4473, and that Morris has maintained documents from firearms purchases. Morris was known, per S-1, to have previously owned a fully automatic rifle. Also, the data extracted from Morris' phone showed he has searched how to convert his firearms to fully automatic and how to use home remedies to make explosives.

103. On June 21, 2021, Morris' current girlfriend, Anna Holodowska (Holodowska) was interviewed by TFO Leblanc and TFO Giftos. During that interview, Holodowska advised Morris has numerous firearms in the house. She stated she believes Morris keeps some of his firearms in a safe, but she advised she has seen several firearms lying around Morris' bedroom. It should be noted that Holodowska is routinely seen, via surveillance, staying the evening at Morris' residence.

104. In my training and experience, people typically store weapons and documents from firearms purchases in various areas and storage spaces in and around their residence and/or property. This can include, but is not limited to, areas such as safes, closets, basements, garages, outbuildings, and attics.

105. There has been no evidence to show that Morris has another place or storage area other than his residence to store his firearms. Furthermore, Morris was seen several times, via

surveillance, bringing firearms out of his residence and putting them in his vehicle, as well as taking firearms out of his vehicle and bringing them into his residence.

106. There is reason to believe firearms could also be located in Morris' Honda. In my training and experience, owners of firearms are known to store firearms in the trunk, glove box, and other consoles in their vehicles. Furthermore, Morris has been observed putting rifle cases in the Honda multiple times, as shown in the photos below:



107. I know these to be photos of Morris based on Morris' NH driver's license photo, surveillance, and meeting him in person at the aforementioned interview.

108. I know the Honda in the photo to be Morris' because he has been observed driving the Honda almost daily via surveillance. Morris is also listed as the only registered owner of the Honda.

109. The first photo (Morris wearing the white t-shirt) was taken on July 20, 2021. The second photo (Morris wearing the brown t-shirt) was taken on November 15, 2021.

Marijuana

110. Several photos, videos, and searches on Morris' recovered cellphone show Morris used, possessed, and grew marijuana. In my training and experience, people keep marijuana in their residence, vehicles, or on their person. It also is reasonable to believe that any marijuana Morris is growing will likely be found in or around his residence, outbuilding, and property.

Electronics

111. Based on aforementioned evidence from Morris' recovered cellphone, there is probable cause to believe that Morris currently has a cellphone that contains encrypted applications, such as EMA1; and that on those encrypted applications is further evidence of Morris advocating for acts of terrorism, contrary to what Morris stated on the SF85P he completed.

112. Furthermore, based on information provided by S-1, there is reason to believe Morris has encrypted applications on other electronic devices such as a laptop, computer, tablet, or other electronic device.

113. In my training and experience, people store electronic devices such as laptops, computers, tablets, etc. in various locations in their residence, in their vehicles, and on their person, particularly in light of their portable nature.

114. In my training and experience, individuals typically keep frequently used electronic devices, such as mobile phones, on their person. Such devices are often attached via armbands or belt holsters, or stored in pockets of pants or coats, backpacks, purses, or other areas within arms-reach for easy access or close enough to receive notifications, whether audible or vibratory.

115. Accordingly, there is reason to believe that a search of the Residence, the Honda, and Morris's person will lead to the discovery of items and evidence related to the violations identified above.

TECHNICAL TERMS

116. Based on my training and experience, I use the following technical terms to convey the following meanings:

- a. IP Address: The Internet Protocol address (or simply "IP address") is a unique numeric address used by computers on the Internet. An IP address looks like a series of four numbers, each in the range 0-255, separated by periods (e.g., 121.56.97.178). Every computer attached to the Internet must be assigned an IP address so that Internet traffic sent from and directed to that computer may be directed properly from its source to its destination. Most Internet service providers control a range of IP addresses. Some computers have static—that is,

long-term—IP addresses, while other computers have dynamic—that is, frequently changed—IP addresses.

- b. Internet: The Internet is a global network of computers and other electronic devices that communicate with each other. Due to the structure of the Internet, connections between devices on the Internet often cross state and international borders, even when the devices communicating with each other are in the same state.
- c. Storage medium: A storage medium is any physical object upon which computer data can be recorded. Examples include hard disks, RAM, floppy disks, flash memory, CD-ROMs, and other magnetic or optical media.

COMPUTERS, ELECTRONIC STORAGE, AND FORENSIC ANALYSIS

117. As described above and in Attachment B, this application seeks permission to search for records that might be found on the Residence, in whatever form they are found. One form in which the records might be found is data stored on a computer's hard drive or other storage media. Thus, the warrant applied for would authorize the seizure of electronic storage media or, potentially, the copying of electronically stored information, all under Rule 41(e)(2)(B).

118. *Probable cause.* I submit that if a computer or storage medium is found on the Residence, there is probable cause to believe those records will be stored on that computer or storage medium, for at least the following reasons:

- a. Based on my knowledge, training, and experience, I know that computer files or remnants of such files can be recovered months or even years after they have been downloaded onto a storage medium, deleted, or viewed via the Internet.

Electronic files downloaded to a storage medium can be stored for years at little or no cost. Even when files have been deleted, they can be recovered months or years later using forensic tools. This is so because when a person “deletes” a file on a computer, the data contained in the file does not actually disappear; rather, that data remains on the storage medium until it is overwritten by new data.

- b. Therefore, deleted files, or remnants of deleted files, may reside in free space or slack space—that is, in space on the storage medium that is not currently being used by an active file—for long periods of time before they are overwritten. In addition, a computer’s operating system may also keep a record of deleted data in a “swap” or “recovery” file.

- c. Wholly apart from user-generated files, computer storage media—in particular, computers’ internal hard drives—contain electronic evidence of how a computer has been used, what it has been used for, and who has used it. To give a few examples, this forensic evidence can take the form of operating system configurations, artifacts from operating system or application operation, file system data structures, and virtual memory “swap” or paging files. Computer users typically do not erase or delete this evidence, because special software is typically required for that task. However, it is technically possible to delete this information.

- d. Similarly, files that have been viewed via the Internet are sometimes automatically downloaded into a temporary Internet directory or “cache.”

119. *Forensic evidence.* As further described in Attachment B, this application seeks permission to locate not only computer files that might serve as direct evidence of the crimes described on the warrant, but also for forensic electronic evidence that establishes how computers were used, the purpose of their use, who used them, and when. There is probable cause to believe that this forensic electronic evidence will be on any storage medium in the Residence because:

- a. Data on the storage medium can provide evidence of a file that was once on the storage medium but has since been deleted or edited, or of a deleted portion of a file (such as a paragraph that has been deleted from a word processing file). Virtual memory paging systems can leave traces of information on the storage medium that show what tasks and processes were recently active. Web browsers, e-mail programs, and chat programs store configuration information on the storage medium that can reveal information such as online nicknames and passwords. Operating systems can record additional information, such as the attachment of peripherals, the attachment of USB flash storage devices or other external storage media, and the times the computer was in use. Computer file systems can record information about the dates files were created and the sequence in which they were created, although this information can later be falsified.

- b. As explained herein, information stored within a computer and other electronic storage media may provide crucial evidence of the “who, what, why, when, where, and how” of the criminal conduct under investigation, thus enabling the United States to establish and prove each element or alternatively, to exclude the innocent from further suspicion. In my training and experience, information stored within a computer or storage media (e.g., registry information, communications, images and movies, transactional information, records of session times and durations, internet history, and anti-virus, spyware, and malware detection programs) can indicate who has used or controlled the computer or storage media. This “user attribution” evidence is analogous to the search for “indicia of occupancy” while executing a search warrant at a residence. The existence or absence of anti-virus, spyware, and malware detection programs may indicate whether the computer was remotely accessed, thus inculpatory or exculpatory the computer owner. Further, computer and storage media activity can indicate how and when the computer or storage media was accessed or used. For example, as described herein, computers typically contain information that log: computer user account session times and durations, computer activity associated with user accounts, electronic storage media that connected with the computer, and the IP addresses through which the computer accessed networks and the internet. Such information allows investigators to understand the chronological context of computer or electronic storage media access, use, and events relating to the crime under investigation. Additionally, some information stored within a computer or electronic storage media may provide crucial

evidence relating to the physical location of other evidence and the suspect. For example, images stored on a computer may both show a particular location and have geolocation information incorporated into its file data. Such file data typically also contains information indicating when the file or image was created. The existence of such image files, along with external device connection logs, may also indicate the presence of additional electronic storage media (e.g., a digital camera or cellular phone with an incorporated camera). The geographic and timeline information described herein may either inculcate or exculpate the computer user. Last, information stored within a computer may provide relevant insight into the computer user's state of mind as it relates to the offense under investigation. For example, information within the computer may indicate the owner's motive and intent to commit a crime (e.g., internet searches indicating criminal planning), or consciousness of guilt (e.g., running a "wiping" program to destroy evidence on the computer or password protecting/encrypting such evidence in an effort to conceal it from law enforcement).

- c. A person with appropriate familiarity with how a computer works can, after examining this forensic evidence in its proper context, draw conclusions about how computers were used, the purpose of their use, who used them, and when.
- d. The process of identifying the exact files, blocks, registry entries, logs, or other forms of forensic evidence on a storage medium that are necessary to draw an accurate conclusion is a dynamic process. While it is possible to specify in advance the records to be sought, computer evidence is not always data that can be merely reviewed by a review team and passed along to investigators. Whether

data stored on a computer is evidence may depend on other information stored on the computer and the application of knowledge about how a computer behaves.

Therefore, contextual information necessary to understand other evidence also falls within the scope of the warrant.

- e. Further, in finding evidence of how a computer was used, the purpose of its use, who used it, and when, sometimes it is necessary to establish that a particular thing is not present on a storage medium. For example, the presence or absence of counter-forensic programs or anti-virus programs (and associated data) may be relevant to establishing the user's intent.

120. *Necessity of seizing or copying entire computers or storage media.* In most cases, a thorough search of a premises for information that might be stored on storage media often requires the seizure of the physical storage media and later off-site review consistent with the warrant. In lieu of removing storage media from the premises, it is sometimes possible to make an image copy of storage media. Generally speaking, imaging is the taking of a complete electronic picture of the computer's data, including all hidden sectors and deleted files. Either seizure or imaging is often necessary to ensure the accuracy and completeness of data recorded on the storage media, and to prevent the loss of the data either from accidental or intentional destruction. This is true because of the following:

- a. The time required for an examination. As noted above, not all evidence takes the form of documents and files that can be easily viewed on site. Analyzing evidence of how a computer has been used, what it has been used for, and who has used it requires considerable time, and taking that much time on premises

could be unreasonable. As explained above, because the warrant calls for forensic electronic evidence, it is exceedingly likely that it will be necessary to thoroughly examine storage media to obtain evidence. Storage media can store a large volume of information. Reviewing that information for things described in the warrant can take weeks or months, depending on the volume of data stored, and would be impractical and invasive to attempt on-site.

- b. Technical requirements. Computers can be configured in several different ways, featuring a variety of different operating systems, application software, and configurations. Therefore, searching them sometimes requires tools or knowledge that might not be present on the search site. The vast array of computer hardware and software available makes it difficult to know before a search what tools or knowledge will be required to analyze the system and its data on the Premises. However, taking the storage media off-site and reviewing it in a controlled environment will allow its examination with the proper tools and knowledge.
- c. Variety of forms of electronic media. Records sought under this warrant could be stored in a variety of storage media formats that may require off-site reviewing with specialized forensic tools.

121. *Nature of examination.* Based on the foregoing, and consistent with Rule 41(e)(2)(B), the warrant I am applying for would permit seizing, imaging, or otherwise copying storage media that reasonably appear to contain some or all of the evidence described in the warrant and would authorize a later review of the media or information consistent with the warrant. The later review may require techniques, including but not limited to computer-assisted

scans of the entire medium, that might expose many parts of a hard drive to human inspection in order to determine whether it is evidence described by the warrant.

122. Because several people share the Residence, it is possible that the Residence will contain storage media that are predominantly used, and perhaps owned, by persons who are not suspected of a crime. If it is nonetheless determined that it is possible the things described in this warrant could be found on any of those computers or storage media, the warrant applied for would permit the seizure and review of those items as well.

123. The warrant I am applying for would permit law enforcement to obtain from certain individuals the display of physical biometric characteristics (such as fingerprint, thumbprint, or facial characteristics) in order to unlock devices subject to search and seizure pursuant to this warrant. I seek this authority based on the following:

- a. I know from my training and experience, as well as from information found in publicly available materials published by device manufacturers, that many electronic devices, particularly newer mobile devices and laptops, offer their users the ability to unlock the device through biometric features in lieu of a numeric or alphanumeric passcode or password. These biometric features include fingerprint scanners and facial recognition features. Some devices offer a combination of these biometric features, and the user of such devices can select which features they would like to utilize.
- b. If a device is equipped with a fingerprint scanner, a user may enable the ability to unlock the device through his or her fingerprints. For example, Apple offers a feature called “Touch ID,” which allows a user to register up to five fingerprints

that can unlock a device. Once a fingerprint is registered, a user can unlock the device by pressing the relevant finger to the device's Touch ID sensor, which is found in the round button (often referred to as the "home" button) located at the bottom center of the front of the device. The fingerprint sensors found on devices produced by other manufacturers have different names but operate similarly to Touch ID.

- c. If a device is equipped with a facial recognition feature, a user may enable the ability to unlock the device through his or her face. For example, Apple offers a facial recognition feature called "Face ID." During the Face ID registration process, the user holds the device in front of his or her face. The device's camera then analyzes and records data based on the user's facial characteristics. The device can then be unlocked if the camera detects a face with characteristics that match those of the registered face. Facial recognition features found on devices produced by other manufacturers have different names but operate similarly to Face ID.
- d. In my training and experience, users of electronic devices often enable the aforementioned biometric features because they are considered to be a more convenient way to unlock a device than by entering a numeric or alphanumeric passcode or password. Moreover, in some instances, biometric features are considered to be a more secure way to protect a device's contents. This is particularly true when the users of a device are engaged in criminal activities and thus have a heightened concern about securing the contents of a device.

- e. As discussed in this affidavit, based on my training and experience I believe that one or more digital devices will be found during the search. The passcode or password that would unlock the device(s) subject to search under this warrant is not known to law enforcement. Thus, law enforcement personnel may not otherwise be able to access the data contained within the device(s), making the use of biometric features necessary to the execution of the search authorized by this warrant.
- f. I also know from my training and experience, as well as from information found in publicly available materials including those published by device manufacturers, that biometric features will not unlock a device in some circumstances even if such features are enabled. This can occur when a device has been restarted, inactive, or has not been unlocked for a certain period of time. For example, Apple devices cannot be unlocked using Touch ID when (1) more than 48 hours has elapsed since the device was last unlocked or (2) when the device has not been unlocked using a fingerprint for 4 hours *and* the passcode or password has not been entered in the last 156 hours. Biometric features from other brands carry similar restrictions. Thus, in the event law enforcement personnel encounter a locked device equipped with biometric features, the opportunity to unlock the device through a biometric feature may exist for only a short time.
- g. In my training and experience, the person who is in possession of a device or has the device among his or her belongings at the time the device is found is likely a user of the device. However, in my training and experience, that person may not be the only user of the device whose physical characteristics are among those that

will unlock the device via biometric features, and it is also possible that the person in whose possession the device is found is not actually a user of that device at all. Furthermore, in my training and experience, I know that in some cases it may not be possible to know with certainty who is the user of a given device, such as if the device is found in a common area of a premises without any identifying information on the exterior of the device. Thus, it will likely be necessary for law enforcement to have the ability to require any individual, who is found at the Subject Premises and reasonably believed by law enforcement to be a user of the device, to unlock the device using biometric features in the same manner as discussed above.

- h. Due to the foregoing, if law enforcement personnel encounter a device that is subject to search and seizure pursuant to this warrant and may be unlocked using one of the aforementioned biometric features, the warrant I am applying for would permit law enforcement personnel to (1) press or swipe the fingers (including thumbs) of any individual, who is found at the subject premises and reasonably believed by law enforcement to be a user of the device, to the fingerprint scanner of the device; (2) hold the device in front of the face of those same individuals and activate the facial recognition feature, for the purpose of attempting to unlock the device in order to search its contents as authorized by this warrant.

CONCLUSION

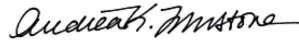
124. I submit that this Affidavit supports probable cause for a warrant to search the Residence and all outbuildings located at 23 Coburn Street, Salem, NH, the Honda, and the

physical person of Kyle Morris, as described in Attachment A and seize items described in Attachment B, believed to be evidence of the violations committed by Morris.

125. I hereby swear under oath that the information set forth in this Affidavit is true and correct to the best of my knowledge, information, and belief.

/s/ Wesley Garland
Wesley Garland
Special Agent
Federal Bureau of Investigation

Attested to by the applicant in accordance with the requirements of Fed. R. Crim. P. 4.1 by telephone, this 7th day of February 2022.



Honorable Andrea K. Johnstone
United States Magistrate Judge
District of New Hampshire



ATTACHMENT A

Property to Be Searched

I. Residence

The property to be searched is 23 Coburn Street, Salem, New Hampshire 03079, and any outbuildings on the property. Given the presence of renters in the residence, the affiant requests the search be limited to Morris' bedroom and any common spaces, to include but not limited to: basement, attic, crawl spaces, and any other areas to which Morris would have access.

The primary structure is a two-story, tan, single family, Cape-style home with two gabled dormers, no shutters, brown roof shingles, and a side driveway and parking area accessible from Coburn Street. The residence is accessed by an exterior door accessible from the driveway side of the house.





II. Vehicle

The property to be searched is a black Honda Accord bearing license plate [NH V61876]:



ATTACHMENT B

Particular Items to be Seized

1. Controlled substances, including, but not limited to marijuana;
2. Weapons to include handguns, ammunition, rifles, shotguns, hand crafted guns, explosive devices, and machine guns;
3. Drug paraphernalia including, but not limited to: scales, bongs, smoking pipes, bubblers, hookahs, blunts, grinders, roach clips, or rolling papers;
4. Materials relating to the conversion or manufacture of automatic weapons, pipe bombs, or other weapons;
5. Indicia of possession of the place to be searched: including articles of personal property, such as personal identification, immigration documents, personal correspondence, delivery pouches, diaries, checkbooks, notes, photographs, keys, utility bills, receipts, personal telephone and address books, and video tapes, tending to establish the identity of the person or persons in control of the areas to be searched;
6. Cellphones, computers, electronic devices, and electronic storage devices, including, but not limited to, USB drives and external hard drives;
7. All records relating to violations of 18 U.S.C. § 1001, 18 U.S.C. § 922(o)(1), 18 U.S.C. § 922(a)(6), and 18 U.S.C. § 922(g)(3), those violations involving Kyle Morris and occurring after March 6, 2018, including:
 - a. Records and information related to involvement in any extremist organization, including, but not limited to, Nationalist Socialist Club/NSC 131;
 - b. Records and information related to advocating acts of terrorism, as that term is defined on the Standard Form 85P (SF85P).

- c. Records and information related to the purchase and acquisition of firearms;
 - d. Records and information related to the growth, use, and acquisition of controlled substances, including, but not limited to, marijuana;
 - e. Records and information related to knowledge that Morris provided false information to questions on the Standard Form 85P (SF85P);
 - f. Records and information related to the acquisition, possession, manufacture, conversion, or sale of weapons, including explosive devices and fully-automatic weapons;
 - g. Records and information related to the importation, manufacture, purchase, possession, sale or use of explosives and their precursors, explosive devices or destructive devices (including components of such devices) including but not limited to pricing sheets, sales receipts, bills of lading, price tags, ledgers or logs. Currency in the form of cash, check, money order, or other real and tangible proceeds or assets from the sale or intended purchase of explosive materials or destructive devices;
 - h. Records and information related to manuals or other literature relating to the assembly, manufacture and/or function of explosives, explosives devices or destructive devices including but not limited to: books, pamphlets, drawings, sketches, diagrams, photographs, and computer prints or photocopies.
10. For any computer equipment or storage medium whose seizure is otherwise authorized by this warrant and any computer or storage medium that contains or in which is stored records or information that is otherwise called for by this warrant (hereinafter, "COMPUTER"):
- a. evidence of who used, owned, or controlled the COMPUTER at the time the things described in this warrant were created, edited, or deleted, such as logs,

registry entries, configuration files, saved usernames and passwords, documents, browsing history, user profiles, email, email contacts, "chat," instant messaging logs, photographs, and correspondence;

- b. evidence of software that would allow others to control the COMPUTER, such as viruses, Trojan horses, and other forms of malicious software, as well as evidence of the presence or absence of security software designed to detect malicious software;
- c. evidence of the lack of such malicious software;
- d. evidence indicating how and when the computer was accessed or used to determine the chronological context of computer access, use, and events relating to crime under investigation and to the computer user;
- e. evidence indicating the computer user's state of mind as it relates to the crime under investigation;
- f. evidence of the attachment to the COMPUTER of other storage devices or similar containers for electronic evidence;
- g. evidence of counter-forensic programs (and associated data) that are designed to eliminate data from the COMPUTER;
- h. evidence of the times the COMPUTER was used;
- i. passwords, encryption keys, and other access devices that may be necessary to access the COMPUTER;
- j. documentation and manuals that may be necessary to access the COMPUTER or to conduct a forensic examination of the COMPUTER;

- k. records of or information about Internet Protocol addresses used by the COMPUTER;
- l. records of or information about the COMPUTER'S Internet activity, including firewall logs, caches, browser history and cookies, "bookmarked" or "favorite" web pages, search terms that the user entered into any Internet search engine, and records of user-typed web addresses; and
- m. contextual information necessary to understand the evidence described in this attachment.

As used above, the terms "records" and "information" includes all forms of creation or storage, including any form of computer or electronic storage (such as hard disks or other media that can store data); any handmade form (such as writing); any mechanical form (such as printing or typing); and any photographic form (such as microfilm, microfiche, prints, slides, negatives, videotapes, motion pictures, or photocopies).

The term "computer" includes all types of electronic, magnetic, optical, electrochemical, or other high speed data processing devices performing logical, arithmetic, or storage functions, including desktop computers, notebook computers, mobile phones, tablets, server computers, and network hardware.

The term "storage medium" includes any physical object upon which computer data can be recorded. Examples include hard disks, RAM, floppy disks, flash memory, CD-ROMs, and other magnetic or optical media.

During the execution of the search of the Subject Premises described in Attachment A, law enforcement personnel are authorized to (1) press or swipe the fingers (including thumbs) of any individual, who is found at the subject premises and reasonably believed by law enforcement

to be a user of a device found at the premises, to the fingerprint scanner of the device; (2) hold a device found at the premises in front of the face those same individuals and activate the facial recognition feature, for the purpose of attempting to unlock the device in order to search the contents as authorized by this warrant.

This warrant authorizes a review of electronic storage media and electronically stored information seized or copied pursuant to this warrant in order to locate evidence, fruits, and instrumentalities described in this warrant. The review of this electronic data may be conducted by any government personnel assisting in the investigation, who may include, in addition to law enforcement officers and agents, attorneys for the government, attorney support staff, and technical experts. Pursuant to this warrant, the FBI may deliver a complete copy of the seized or copied electronic data to the custody and control of attorneys for the government and their support staff for their independent review.